



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 13, 1993

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-254/93004; 50-265/93004
NRC Docket Numbers 50-254 and 50-265

Reference: Brent Clayton letter to L.O. DelGeorge dated
March 12, 1993 transmitting NRC Inspection Report
50-254/93004; 50-265/93004

Enclosed is Commonwealth Edison Company's response to the Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited the failure to perform a logic system functional test at each refueling outage for the High Pressure Coolant (HPCI) and Reactor Core Isolation Cooling (RCIC) systems, per Technical Specification. According to the NOV, from initial operation until February 5, 1993, CECO did not perform logic system functional tests on the automatic suction transfer circuit for the HPCI and RCIC systems. CECO's response is provided in the attachment.

If there are any questions or comments concerning this letter, please refer them to Marcia Jackson, Compliance Administrator at (708) 663-7287.

Respectfully,

D.L. Farrar
Nuclear Regulatory Services Manager

Attachment

cc: A.B. Davis, Regional Administrator - RIII
C. Patel, Project Manager - NRR
T. Taylor, Senior Resident Inspector, Quad Cities

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**RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-254/93004; 50-265/93004**

VIOLATION: 254(265)/93004-03

During a NRC inspection conducted on January 12 through February 22, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the following violation is listed below.

Technical Specifications 4.5.C.5 and 4.5.E.5, High Pressure Coolant Injection Subsystem (HPCI) and Reactor Core Isolation Cooling (RCIC) respectively, require a logic system function test at each refueling outage. Technical Specification 1.k, Definitions, defines a logic system functional test as a test of all relays and contacts of a logic circuit from sensor to activated device, to ensure operability per design intent.

Contrary to the above, from initial operation until February 5, 1993, the licensee did not perform logic system functional test for the automatic suction transfer circuit for the HPCI and RCIC systems.

This is a Severity Level IV violation (Supplement 1).

REASON FOR VIOLATION:

CECo acknowledges the violation. Reviews of testing requirements were not adequate. This problem was identified during a Quality Verification Audit of the HPCI system prior to this event.

Per Technical Specification 4.5.C.5 and 4.5.E.5, a logic system functional test shall be performed on the HPCI and RCIC systems once per refuel outage. The Technical Specification definition of "logic system functional test" means a test of all relays and contacts of a logic circuit from sensor to activated device such that each component operates per design intent. The CCST low level and Torus high level switches, 1/2-2350(A-D) and 1(2)-2351 (A and B), respectively, were not tested from the level switch's float for each level switch to the 1(2)-2330-150 and 151 relays (RLY). QCEMS 350-3 and 350-4, RCIC and HPCI Logic Functional Test, test the logic circuitry from the relays to each required component.

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CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The immediate corrective actions were to declare both Unit 1 and 2 HPCI and RCIC systems inoperable and initiate outage reports for all the systems. This placed the Unit 1 and 2 reactors in a Limiting Condition for Operating (LCO) requiring shutdown within 24 hours. Action was taken to lineup the RCIC suction path to the suppression pool on both units. The 24 LCO was exited.

Technical Staff personnel wrote Interim procedure 42, CCST/Torus Level Switch Functional Test for both units. Interim procedure #42 was performed successfully on February 5, 1993, which verified proper operation of level switches for both the HPCI and RCIC systems.

CORRECTIVE ACTIONS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

In order to ensure CCST and Torus level switches are properly tested in accordance with Technical Specifications, the Operating department has drafted a surveillance procedure QCOS-2300-11 CCST/Torus Level Switch Refuel Outage Functional Test, that will test these switches once a refuel cycle.

Also, the station will continue implementation of the Safety Related Contact Program which is reviewing safety related contacts to ensure the contacts meet Technical Specification testing requirements.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on February 5, 1993 when the CCST/Torus Level Switch Functional Test was performed successfully.