



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 10, 1993

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

Attn: Document Control Desk


Subject: Quad Cities Nuclear Power Station Units 1 and 2
Amended Response to Notice of Violation (NOV) 93005-03
Inspection Report Nos. 50-254/93005; 50-265/93005
NRC Docket Nos. 50-254 and 50-265

References: 1) CECO letter, D.L. Farrar to the USNRC dated March 29, 1993
2) T. Martin letter to L. DelGeorge dated
February 26, 1993 transmitting NRC Inspection Report
Nos. 50-254/93005; 50-265/93005

A conference call was held on April 27, 1993 between representatives of CECo and the NRC. The purpose of the call was to discuss the response to violation 93005-03 of the subject NOV. The NOV cited three violations involving; 93005-01) improper classifications, 93005-02) inadequate testing, and 93005-03) inadequate maintenance on the HPCI check valves. The NRC requested a clarification of how the information provided in the CECo response (Reference 1) for 93005-03 was used for the check valve program. CECo's amended response to the violation 93005-03 is provided in Attachment A.

If your staff has any questions or comments concerning this transmittal, please refer them to Marcia Jackson, Compliance Administrator at (708) 663-7285.

Sincerely,


D.L. Farrar
Regulatory Services Manager

Attachments

cc: A.B. Davis, Regional Administrator - RIII
J. Stang, Project Manager - NRR
T. Taylor, Senior Resident Inspector

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION NRC INSPECTION REPORT 50-254/93005; 50-265/93005

VIOLATION: 254(265)93005-03

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures and Drawings, requires, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances. In addition, instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria.

Contrary to the above, QCMMS 2300-1, "HPCI Torus Suction Check Valve (1(2)-2301-39) Disassembly and testing - Test Every Third Refueling Outage" Rev. 0", dated October 3, 1991, did not include appropriate quantitative or qualitative acceptance criteria to assure the check valves were adequately reassembled following maintenance.

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

REASON FOR VIOLATION:

CECo agrees that procedure QCMMS 2300-1 "HPCI Torus Suction Check Valve (1(2)-2301-39) Disassembly and Testing - Test Every Third Refueling Outage" Rev. 0 did not provide guidance to ensure the valves were properly seated. Again, this is a direct result of the classification of the valves as discussed in violation 254 (265)/93005-01. Since no safety function in the closed direction was identified, no test was specified. Since no test was specified, no acceptance criteria was needed.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Upon discovery that the HPCI discharge piping could not be vented per the requirements of Technical Specification 4.5.G.3 the HPCI system was declared inoperable and the appropriate Limiting Conditions for Operations followed. The 1(2)-2301-39 valves were disassembled, repaired and tested. The close function of each valve was tested by verifying the discharge piping could be filled and vented while the system was lined up to take a suction path from the torus.

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CORRECTIVE ACTIONS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Procedure QCMMS 2300-1 is currently being revised to include testing and acceptance criteria for the HPCI torus suction check valves 1(2)-2301-39 in the closed direction. The revision, validation, and approval will be completed by May 31, 1993.

CECo Engineering and Construction, Mechanical/Structural Design has provided Quad Cities Station with technical evaluation and recommendation which addresses performance of seat and disc contact inspections for the check valve program. This information was used when revising QCMMS 2300-1.

Furthermore, when a check valve within the scope of the check valve program is disassembled, the check valve coordinator is notified. A signoff is provided in the work package to indicate that this inspection has been completed. A data sheet, QAP 400-S31 through S34, will be generated to document the type of seat leakage check that is performed.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved in May 1993 with the approval of the revised QCMMS 2300-1 procedure.