



Commonwealth Edison

Quad Cities Nuclear Power Station
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GGC-94-122

September 19, 1994

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

Attention: Document Control Desk

Subject: Quad Cities Power Station Units 1 and 2;
NRC Docket Number 50-254 and 50-265;
NRC Inspection Report Numbers 50-254(265)/94016

Reference: W.L. Axelson letter to E. Kraft dated August 17, 1994,
transmitting Notice of Violation.
Inspection Report 50-254/94016; 50-265/94016

Enclosed is Commonwealth Edison's response to the Notice of Violations (NOV) transmitted with the referenced letter. The NOV cited one Severity Level IV violation. The violation was a failure to follow procedures during RHR system operation.

The following commitments are being made by this letter:

1. An Operations Department Improvement Initiative has been developed to address the issues of self-check, procedure adherence, and operator work practice expectations. This initiative will be conveyed to shift management on September 22, 1994 and fully implemented by November 30, 1994.

If there are any questions or comments concerning this letter, please refer them to Ron Baumer, Regulatory Assurance Department at (309) 654-2241 extension 3102.

Respectfully,

for LG Tucker
Guy G. Campbell
Station Manager
GGC/RB/db

230007

cc: J. Martin, Regional Administrator, RIII
R. Pulsifer, Project Manager, NRR
C. Miller, Senior Resident Inspector, Quad Cities

JE01/10

VIOLATION :

During an NRC inspection conducted on June 24 through July 28, 1994, 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 (1994), the violation is listed below:

Technical Specifications Section 6.2.A states that procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, shall be established and implemented. Regulatory Guide 1.33 included plant operating procedures and procedures for start-up of safety related systems.

Quad Cities Operating Procedure (QCOP) 1000-9, Rev. 4, "Torus Cooling Start-up and Operation," required the RHR loop to be used for torus cooling be in standby per QCOP 1000-2, Rev. 3, "RHR System Preparation For Standby Operation," prior to going to the torus cooling mode.

Contrary to the above, on July 7, 1994, the 1B RHR loop was not in standby per QCOP 1000-2 prior to putting the loop in torus cooling mode.

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

REASON FOR THE VIOLATION:

ComEd acknowledges the above violation. As per PIF 94-1710, this event was caused by inattention to detail and poor work practices during the conduct of procedure QCOP 1000-2, RHR System Preparation for Standby Operation, and QCOP 1000-9, Torus Cooling Startup and Operation.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The personnel involved in the event were counseled with respect to the importance of self-check, attention to detail and procedure adherence as it pertains to safe and event free operation.

Although not specifically related to the cause of the event, other concerns were identified during the conduct of this evolution that required additional management attention. The following corrective actions were taken to address these concerns:

- The Unit Supervisor was counseled with respect to the need for immediate notification of the Shift Engineer following the occurrence of any event of this nature.
- A Daily Order Book entry was made to inform the oncoming crews that the waiving of procedure prerequisites was no longer acceptable. This entry remain in effect until procedure QCAP 1100-12, Procedure Use and

Adherence, could be revised accordingly.

- Procedure QCAP 1100-12, Procedure Use and Adherence, was revised to eliminate the option of waiving procedure prerequisites. This procedure change became effective on July 29, 1994.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

1. An Operations Department Improvement Initiative has been developed to address the issues of self-check, procedure adherence, and operator work practice expectations. This initiative will be conveyed to shift management at an Upcoming Operations Management meeting on September 22, 1994 and implemented with each crew subsequent to this meeting. Highlights of the program include:
 - One on one coaching sessions between a member of shift operations management and each member of the respective crew. These coaching sessions will include a review of selected events with similar causal factors, a review of QCAP 1100-12, Procedure Use and Adherence, a review of QCAP 2300-28, Self-Check, and a review of the various options available for revising or creating procedures as well as the applicability of each option.
 - Pre-job briefings between task performers and their supervisor consisting of a complete review of the procedure being performed, and the mode of use expected for the procedure (i.e. continuous use, reference use, informational use) in accordance with QCAP 1100-12, Procedure Use and Adherence, as well as an emphasis on the importance of self-check/attention to detail as applied to the upcoming evolution.
 - An independent verification of procedure prerequisites shall be performed by another member of the operating crew.

Although not specifically related to the cause of this event, other concerns were identified during the conduct of this evolution that required additional management attention. The following corrective actions will be taken to address these concerns:

- Operating Department guidance will be developed to address the expected crew response to events involving personnel error. These guidelines will be disseminated to shift management by use of a Daily Order Book entry, and then reviewed with each crew during their subsequent shift briefing.
- Operating Department guidelines will be developed to address crew

expectations with respect to starting plant equipment. These guidelines will be disseminated to shift management by use of a Daily Order Book entry, and then reviewed with each crew during their subsequent shift briefing.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Implementation of the aforementioned Improvement Initiatives will begin by September 30, 1994 and full implementation will be achieved by November 30, 1994.