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April 08, 1994

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

Attn: 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)/94002

Reference: Edward G. Greenman letter to R. Pleniewicz dated March 11,
1994, transmitting Notice of Violation.
Inspection Report 50-254/94002; 50-265/94002

Enclosed is Commonwealth Edison's response to the Notice of Violations (NOV) transmitted with the referenced letter. The NOV cited two Severity Level IV violations. The violations were:

- 1) Control of High Radiation Areas in accordance with Tech Spec 6.12.1.a
- 2) Control of material leaving a radiologically controlled area in accordance with Tech Spec 6.3 and QRP 1000.

The following commitments are being made by this letter:

- 1) The station will establish a centralized tool issue and storage facility inside the RPA by December 31, 1994.

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

Respectfully,

D. L. Farrar, Manager
Nuclear Regulatory Services

Attachment

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

VIOLATIONS:

Technical Specification 6.3. requires that radiation protection procedures be established, maintained, and adhered to.

Quad Cities Radiation Protection Procedure (QRP) 1000 requires, in part, that material leaving the radiologically controlled area be surveyed before release to ensure that radioactive material is not being released.

Contrary to the above, on January 7, 1994, and on several other occasions in 1993, contaminated tools and equipment were not surveyed before release from the radiologically controlled area.

This is a Severity Level IV violation.

REASON FOR THE VIOLATION:

CECo acknowledges and agrees with the violation the cause of the events were due to inattention to detail by the station workers.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

- 1) The material was transferred to the appropriate storage areas. Additional surveys of the affected areas were performed.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

1. The station is in the process of establishing a centralized tool issue and storage facility inside the radiological posted area (RPA). This will be in place by December 31, 1994. Until the facility is established the station will implement an interim procedure on tool control inside the RPA. The interim procedure will be implemented by April 30, 1994.
2. The station has erected a LTD (Laundry/Tool Decon) building designed to handle hotshops and laundry inside the radiological posted area (RPA).
3. The Health Physics department will develop and provide a training package to the department heads for presentation to all department personnel for reinforcing station/management expectations for the control of material leaving a Radiological Posted Area (RPA)..

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved when the subject tools/materials were transferred to the appropriate storage areas.

VIOLATIONS:

Technical Specification 6.12.1.a requires that high radiation areas greater than 100 millirem/hr (1 millisievert/hr) (mSv) but less than 1000 millirem/hr (10 mSV/hr) be barricaded and conspicuously posted as a high radiation area and areas greater than 1000 mrem/hr be provided with locked doors and controlled to prevent unauthorized entry.

Contrary to the above, a high radiation area greater than 100 mrem/hr but less than 1000 mrem/hr was not barricaded and conspicuously posted as a high radiation area and an area greater than 1000 mrem/hr was not provided with a locked door and controlled to prevent unauthorized entry. Specifically:

- a) on August 14, 1993, an access door to an area greater than 1000 mrem/hr, near the main condenser tube pull pit area was unlocked, and
- b) on November 25, 1993, a door leading into the backwash receiving tank room, an area greater than 100 mrem/hr but less than 1000 mrem/hr, was propped open.

This is a Severity Level IV violation.

REASON FOR THE VIOLATION:

CECo acknowledges and agrees with the violation. The cause of the events were due to inattention to detail by the station workers.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

1. The subject door was immediately locked and all other doors in the Turbine building were verified. Additionally, the station performed a daily verification of all doors for a period of 10 days.
2. The backwash receiving tank room door was closed and an additional barrier was erected.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

1. The station has revised procedure QCAP 620-1, "High Radiation Area Access" which requires dual verification of locked doors upon exit.
2. Warning signs were posted on the inside of doors instructing workers to verify door is locked.
3. The station is evaluating the use of additional swing gates as a dual barrier.

4. The Health Physics department will develop and provide a training package to the department heads for presentation to all department personnel for reinforcing station/management expectations for the control of High Rad doors.
5. The station is having Corporate HP perform a Root Cause analysis of the Hi-Rad door event trends. Additional corrective actions (if any) will be reviewed and implemented as required upon completion of the analysis.

Note: Since the issue of this NOV, the station has experienced two additional Hi-Rad door events. One of the events was due to mechanical failure (sticking) of the swing gate and not due to any human error/inattention. The station is investigating the cause and solution to this problem. The second event was attributed to inattention, however the use of dual barriers will prevent this from occurring. The individual involved in the second event immediately identified the problem and notified the station of the problem. The station is currently conducting an investigation of the event through the station's Problem Identification process (PIF 94-0789).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved when the doors were locked and verified.

PIF 94-0789
PIF 94-0785