



Commonwealth Edison

Quad Cities Nuclear Power Station
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ESK-94-060

October 21, 1994

Mr. J. B. Martin
Regional III Administrator
U. S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

SUBJECT: Quad Cities Nuclear Power Station Unit 1
Response to Confirmatory Action Letter (CAL) RIII-94-006
Resolution of Foreign Material Exclusion Events
NRC Docket Number 50-254

REFERENCES:

- (1) J. B. Martin to M. J. Wallace letter dated July 26, 1994;
Confirmatory Action Letter - CAL No. RIII-94-006
- (2) Meeting/Teleconference between ComEd (E. S. Kraft, Jr., et al) and
NRC Region III (P. Hiland, et al) on August 2, 1994
- (3) E. S. Kraft, Jr. to J. B. Martin letter dated August 5, 1994

Dear Mr. Martin,

In the reference (1) letter, the Nuclear Regulatory Commission (NRC) issued a Confirmatory Action Letter (CAL) to Commonwealth Edison (ComEd) in regards to two foreign material exclusion (FME) events at the Quad Cities Station. As part of that CAL, the NRC required ComEd to submit a written report within 30 days of the completion of the investigation into the foreign material problems at Quad Cities Station Unit 1.

In response to these events at Quad Cities Station in July 1994, site management implemented a four-part integrated strategy to achieve the objectives described above. This strategy consisted of two Level 3 Root Cause investigations of the FME events; a Level 2 evaluation of the Quad Cities Station FME program; a systematic evaluation of Unit 1 and Unit 2 equipment and systems to ensure that all systems with a potential for contacting the Reactor Vessel are free of foreign material; and development of a phased program to ensure that appropriate FME controls are implemented for all current and future work evolutions.

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During the reference (2) meeting and teleconference between ComEd and the NRC, ComEd described the four-part integrated strategy and approach for: 1) determining the root causes of the events; 2) evaluating the integrity and operability of equipment and systems on Unit 1 and Unit 2; 3) evaluating the adequacy of the Quad Cities FME program; and 4) ensuring that appropriate FME controls are implemented for all current and future work evolutions. ComEd provided a written summary of this information in reference (3). ComEd also indicated that the results of the Level 2 Investigation, as well as the Phase 2 and 3 FME controls (including an implementation schedule) would be provided within 30 days of the completion of the investigation.

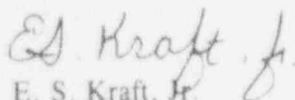
In accordance with the requirements of the reference (1) CAL, this letter transmits, as enclosure A, the final Level 2 Investigation Report, which evaluated the adequacy of the Quad Cities FME Program. Enclosure B of this letter contains the long term corrective actions associated with the phased FME program (including implementation schedule). In addition, a description of the Phase 2 and 3 FME program controls is provided as enclosure C.

The Level 2 Investigation of the adequacy of the Quad Cities FME program identified weaknesses in defining, communicating, and reinforcing expectations for FME practices, as well as monitoring the performance of work to determine if expectations are understood. These weaknesses lead to the ineffectve implementation of the FME program.

The long term corrective actions associated with the phased FME program includes a station policy that supports upper management expectations regarding FME, a new FME procedure, training lesson plans based on FME task analysis, increased material inventory of commonly used FME devices, FME program assessment by maintenance, establishment of an FME program manager, and continued efforts to present awareness of foreign material exclusion throughout the station.

If there are any further questions, please contact Mr. Nick Chrissotimos at (309)654-2241 extension 3100.

Sincerely,



E. S. Kraft, Jr.
Site Vice President
Quad Cities Station

Enclosure A: Final Level 2 Investigation - Adequacy of the Quad Cities FME Program
Enclosure B: Long Term Corrective Actions Associated With The Phased FME Program
Enclosure C: A Description Of The Phase 2 and Phase 3 FME Program Controls

cc: ☒ Document Control Desk
P. Hiland, Section Chief - Dresden/Quad Cities
C. Miller, Senior Resident Inspector - Quad Cities Station
R. Pulsifer, Project Manager - NRR
Office of Nuclear Facility Safety - IDNS