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ESK-95-124

August 4, 1995

Director, Office of Enforcement  
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)/95004

**REFERENCE:** John B. Martin Letter to E. S. Kraft, Jr., Dated April 14, 1995,  
Transmitting Notice of Violation

Enclosed is Commonwealth Edison's (ComEd's) response to the three Notice of Violations transmitted with the referenced letter. The NOV cited three Severity Level IV violations. The violations were 1) failure to perform the required checklists for a NDE Inspector, 2) failure to perform required testing on a scram inlet valve following maintenance, and 3) failure to perform required initial physical's on new watchperson's per the security plan.

This letter contains no new commitments.

If there are any questions or comments concerning this letter, please refer them to Nick Chrissotimos, Regulatory Assurance at (309)654-2241, extension 3100.

Respectfully,

A handwritten signature in dark ink, appearing to read "E. S. Kraft, Jr.", is written over the typed name.

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

Attachment

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

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## **VIOLATION 50-254/265-95004-04**

1. Technical Specification 6.2.A. required that written procedures be established, implemented, and maintained covering activities recommended in Regulatory Guide 1.33, Rev. 2, Appendix A. Appendix A of Regulatory Guide 1.33 included plant procedures for maintenance that can affect safety related equipment.

- a. Quad Cities Administrative Procedure (QCAP) 1700-4, "Non-Destructive Examination (NDE) Personnel Certification Review," Rev. 0, steps D.3 through D.8 required that a checklist (Appendix A of QCAP 1700-4) be reviewed and completed before personnel begin work, documenting the qualifications of NDE personnel.

Contrary to the above, on April 14, 1995, checklists (Appendix A of QCAP 1700-4) had not been completed to document the qualification of an NDE contractor performing ultrasonic examination (UT) of core shroud vertical welds prior to the individual beginning work.

- b. Quad Cities Technical Staff Procedure (QCTP) 130-6, "Inservice Inspection Plan," Rev. 0, step F.16 required preparation of qualification review sheets for each of the contractor's NDE personnel.

Contrary to the above, on April 14, 1995, qualification review sheets had not been completed for an NDE contractor performing UT of the core shroud.

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

## **REASON(S) FOR THE VIOLATION**

ComEd acknowledges the violation. The root cause of the above event was inadequate procedure adherence related to requesting and providing the proper personnel certification documentation in a timely manner.

## **CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED**

The corrective action included review of the NDE inspectors' certification and completion of the required checklist per procedure. The certification was deemed acceptable.

### **CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION**

The station has taken the following actions to prevent further occurrence:

The ISI Coordinator was responsible for implementation of the required checklist and was subsequently counseled on the procedural requirements. In addition, an internal memorandum was issued to the inspections/testing group to reinforce the procedural requirements and to heighten the level of awareness. This is an isolated case as each department is responsible for ensuring that contractors are properly qualified and certified for the work performed. No other cases were previously identified in other departments.

### **DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

Full compliance was achieved with the completion of the required checklist per procedure QCAP 1700-4 on April 24, 1995.

### **VIOLATION 50-254/265-95004-02:**

10 CFR 50.55A.(F)(4)(11), stated, in part, that inservice tests to verify operational readiness of pumps and valves, whose function is required for safety, must comply with the requirements of the American Society of Mechanical Engineers(ASME) Boiler and Pressure Vessel Code. ASME Section XI(1986), Section IWV-3200, "Valve Replacement, Repair, and Maintenance", required that after valve stem packing had been adjusted, and prior to its return to service, the valve shall be tested to demonstrate that the performance parameters were within acceptable limits.

Contrary to the above, on April 23, 1995, following valve packing adjustments on the Unit I Scram inlet valve(I-305-126), for the Hydraulic Control Unit (HCU) for control rod L-14, the licensee did not test the valve prior to returning to service.

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

### **REASON FOR VIOLATION:**

ComEd acknowledges the violation. The reason for the violation was that Operators failed to immediately recognize the need for testing after completion of maintenance which had potential impact on system operability.

On April 23, 1995, a Mechanical Maintenance Supervisor (MMS) requested permission to adjust the packing on the Scram Inlet Valve for Control Rod Drive (CRD) L-14. The Shift Engineer (SE) asked the MMS if the CRD needed to be scram timed when the work was completed. The MMS, speaking from memory, recalled a memo from General Electric (GE) in the work package and incorrectly informed the SE that 5 to 15 in-lbs torque can be used for the Unit 1 scram valve packing adjustments without performing hot scram timing. Neither the SE or the Unit 1 Unit Supervisor (US) looked further into the package at the required Post Maintenance Testing / Verification (PMTV) prior to granting the MMS permission to perform the work.

The SE is responsible for maintaining operability which includes PMTV to verify operability. The SE and the US each failed to recognize that hot scram timing was required to be performed after adjusting the scram inlet valve packing. Neither the SE or US used a written document to verify the statement made by the MMS.

On April 28, the individual who had been assigned as Unit 1 US (on April 23) was assigned as the extra US and discovered that CRD L-14 needed to be hot scram timed. At 1655, CRD L-14 was fully inserted to position "00" and at 1800, hot scram timing was completed.

#### **CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:**

After the US discovered that the control rod needed to be hot scram timed, the control rod was fully inserted to position 00. The Operations Manager and the Bulk Power Office were notified and a Problem Identification Form (PIF) was written. A load drop was started to reduce power to 770 Mwe where the CRD was successfully scram timed.

The Station Manager and the Site Vice President instructed the Operations Manager to investigate and put corrective actions in place. A search was performed that determined no other Unit 1 HCU work was completed during the same time frame as the HCU for control rod L-14.

#### **CORRECTIVE ACTIONS TO PREVENT RECURRENCE:**

On April 29, 1995, the Operations Manager sent a letter to all Operating crews explaining the event and stressing:

- Operators shall ensure that they understand the methods in which information was obtained.
- An SRO will verify testing that needs to be performed on a operating running unit.

On April 29, 1995, the Master Mechanic discussed this event and the importance of verifying information with the Mechanical Maintenance personnel involved.

On May 5, 1995, QCAP 306-00, Work Execution, was changed to require an SRO to review the Post Maintenance Testing / Verification (PMTV) prior to signing "Shift Authorization to Start Work" to insure that any testing requirements can be performed for the plant conditions expected upon work completion.

On May 5, 1995, QCAP 2200-2, Work Control Process, was changed to direct Maintenance to forward all completed work request (WR) packages on the non-outage unit to the responsible US/SE for review of PMTV requirements.

On May 6, 1995, the Shift Operating Supervisor (SOS) reviewed a draft of this report with all SEs and directed each SE to discuss it with all SROs on their Operating Crew, highlighting:

- Operability determinations are the responsibility of the SRO's.
- need for sensitivity to reactivity management issues.
- need for extra work scope reviews on unscheduled work by cognizant engineers.
- testing is always required after CRD HCU maintenance.

On May 6, 1995, the Operations Manager wrote a memo on "Expectations for Activities Affecting Reactivity" and placed it in the Daily Order Book.

On May 6, 1995, QCAP 200-15, Work Activity Screening, was implemented to sensitize all personnel to the fact that work on many systems can lead to the potential for ESF actuation, plant transients, and/or trips, all of which may be of safety significance.

This event was tailgated with all Maintenance discipline personnel, including the change to QCAP 2200-2 directing completed WRs on non-outage unit to the US. This was completed by August 1, 1995.

**DATE WHEN FULL COMPLIANCE WILL BE MET:**

Full compliance was achieved with the completion of the scram time testing on April 28, 1995.



## **VIOLATION 50-254/265-95004-05**

3. Section H.3.E. of the facility Operating Licenses DPR-29 and DPR-30 for the Quad Cities Nuclear Power Station requires the licensee to maintain in effect and fully implement all provisions of the Commission approved physical security plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p).

Section 1.2.1. of the Security Personnel Training and Qualifications Plan requires that security force members shall successfully pass a physical examination conducted by a licensed physician to measure their ability to perform required security job duties.

Contrary to the above, on May 23, 1995, nine members of the security force had no physical examination conducted to measure their ability to perform required security job duties.

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

### **REASON(S) FOR THE VIOLATION**

ComEd acknowledges the violation. This error in judgement was made due to confusion between the security contractor management organization and the ComEd security management organization over the differences in the physical examination requirements between watch persons and armed security officers. This group of watch persons was the first hired since the implementation of the watch person program at Quad Cities Station. Watch persons do not require an annual physical exam like the armed security officers do. This lack of an annual physical exam requirement was interpreted by the security contractor as no requirement for a watch person physical exam.

### **CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED**

All nine watch persons were relieved of their duties until they could be given a physical exam. They all successfully passed a physical exam by May 25, 1995, and returned to work.

### **CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION**

All ComEd Station Security Administrators and the security contractor managers were made aware of the error and the correct requirement. The violation of the Security Plan requirement was discussed at the Security Administrator's meeting held on May 25, 1995.

### **DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

Full compliance was achieved with the completion of the physical's by the watch person individuals on May 25, 1995.