



Commonwealth Edison  
One First National Plaza Chicago Illinois  
Address Reply to Post Office Box 787  
Chicago Illinois 60690

DMB

September 6, 1984

Mr. James G. Keppler  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
199 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Quad Cities Station Units 1 and 2  
Response to Inspection Report  
Nos. 50-254/84-08 and 50-265/84-07  
NRC Docket Nos. 50-254 and 50-265

Reference (a): C. E. Norelius letter to Cordell Reed  
dated August 3, 1984.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. A. L. Madison, A. D. Morrongiello, J. C. Bjorgen, S. Hare and F. Maura on May 20 through June 23, 1984, of activities at Quad Cities Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

*Robert M. Curran for*  
D. L. Farrar  
Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - Quad Cities

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COMMONWEALTH EDISON COMPANY

ATTACHMENT

Response to Notice of Violation

The following is the response to the items of noncompliance identified in the Appendix to the NRC letter dated August 3, 1984, from C. E. Norelius to Cordell Reed.

ITEM 1

10 CFR 50, Appendix J, Section III.A.1(a) required that if during a Type A test potentially excessive leakage paths are identified which will interfere with satisfactory completion of the test or which will result in a Type A test not meeting the acceptance criteria, the Type A test shall be terminated and the leakage through such paths shall be measured using local leakage testing methods. Repairs and/or adjustments to equipment shall be made and a Type A test shall be performed.

Contrary to the above, during the performance of Type A test in February 1984 a leaking flange on a 1/2 inch torus level instrument line was repaired without first measuring its leakage rate.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The corrective action taken was to change the Quad Cities procedures for the Type A test, QTS 150-1 and 150-6. The procedure used for the Unit 2 test included references to estimating localized leaks discovered during the pressurization and stabilization phases of the test. These sections were removed and replaced with words stating that the leaks must be measured prior to repairs.

CORRECTIVE ACTION TO AVOID FURTHER NONCOMPLIANCE

All Technical Staff personnel involved in conducting the Type A test were given training in test methods and regulatory requirements prior to performing the Unit 1 test on July 25-26, 1984. All procedure changes, including the ones mandated by this noncompliance, were discussed. Strict adherence to the revised procedure was verified by the NRC inspector for the Unit 1 test.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The corrective actions described above have been implemented and full compliance achieved.

## ITEM 2

10 CFR 50, Appendix J, Section II.G defines Type B tests as those tests intended to detect local leaks and measure leakages across each pressure-containing or leakage-limiting boundary for containment penetrations whose design incorporates gaskets among others. Section III.B describes the Type B test acceptable methods, test pressure, and acceptance criteria. Section III.D.2 prescribes the schedule and frequency of Type B test to be at every refueling outage but in no case at intervals exceeding 2 years.

Contrary to the above a Type B local leak rate test has not been performed on a 1/2 inch torus level instrument line flange since it was originally declared operable on February 1981.

## CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

This item of noncompliance was the result of a modification to the instrument lines when the level transmitters were installed and subsequently relocated without including a Type B test as part of the modification test. The immediate corrective action to this noncompliance was to write a local leak rate test procedure, QTS 100-40, for the instrument volumes with the flange gaskets. This procedure was implemented in July, 1984. Local leak rate tests will be performed on both units for each instrument of this type on each subsequent refueling outage. The instrument lines were Type B tested with no detectable leakage on Unit 1 prior to its startup in August, 1984.

## CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

For this item of noncompliance, the following additional actions have been taken to avoid further noncompliance:

1. The noncompliances issued to the Quad Cities Station have been placed on the agenda for discussion at the next Commonwealth Edison ILRT Committee meeting to make all Commonwealth Edison nuclear stations aware of the circumstances involved.
2. Since the primary responsibility for modification test criteria rests with the cognizant person in the station Technical Staff, additional training concerning the definition of the primary containment boundary and testing requirements following any modification to that boundary was provided to all Technical Staff personnel.

3. An engineering review of the Quad Cities piping and instrument drawings was conducted to identify the presence of any other pipe flanges with gaskets that might be present without being LLRT'd. No other gaskets like the ones in question were identified.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The corrective actions listed above have been implemented and full compliance is achieved at this time. . .

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