



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 19, 1992

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-254/92005; 50-265/92005
NRC Docket Nos. 50-254 and 50-265

Reference: L. R. Greger letter to Cordell Reed dated
February 21, 1992 transmitting NRC Inspection
Report 50-254/92005; 50-265/92005

Enclosed is Commonwealth Edison company's (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter and Inspection Report. The NOV cited one Severity Level IV violation requiring a written response. The violation concerned the failure of earlier corrective actions to effectively correct problems associated with the control of high radiation areas to prevent unauthorized entry. CECO's response is provided in the attachment.

If your staff has any questions or comments concerning this transmittal, please refer them to James Watson, Compliance Engineer at (708) 515-7205.

Sincerely,

P. L. Barnes
for

T.J. Kovach
Nuclear Licensing Manager

250015

Attachments

cc: A.B. Davis, Regional Administrator - Region III
L.N. Olshan, Project Manager, NRR
T. Taylor, Senior Resident Inspector

ZNLD/1631/1

9203250322 920319
PDR ADOCK 05000254
Q PDR

FEU

ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION NRC INSPECTION REPORT 50-254/92005; 50-265/92005

VIOLATION

10 CFR 20.203(c)(2)(iii) requires in part that, in the absence of certain specified control devices, each entrance or access point to a high radiation area be maintained locked except during periods when access to the area is required with positive control over each individual entry.

Contrary to the above, on several occasions in 1991, in the absence of the specified control devices, doors to high radiation areas were not locked or controlled to prevent unauthorized entry.

REASON FOR THE VIOLATION

The door control problems, as discussed in the inspection report, are attributed to personnel failing to secure doors or return high radiation area keys as required by station procedures.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Radiation Occurrence Reports were initiated and investigations completed for each identified incident. In each case where the specific personnel involved could be identified, these individuals were interviewed by a panel of senior station management personnel and follow-up actions including discipline, were assigned. As noted in the NRC inspection report, the station has initiated a number of actions in an attempt to improve performance of properly controlling high radiation areas. Most of these actions were designed to heighten the level of awareness of personnel to the importance of properly controlling high radiation areas. This approach was taken because the station high radiation area control program relied on the individuals signing out the key to ensure that all procedural requirements were followed. The station acknowledges that these actions have not produced satisfactory performance.

During the present outage (Q2R11), personnel were placed at frequently used high radiation area entrances to control access. These personnel were effective in reducing high radiation area control problems until the station was able to make a complete revision to the high radiation area control program. In January 1992, the station received an amendment to the plant Technical Specifications (section 6.12) which allows control of high radiation areas in the manner described in generic Technical Specifications. The present control program will be modified under the terms of the Technical Specifications to provide controls on the area based on the radiation hazard of the area. The new control program will reduce the number of locked high radiation areas from 140 to below 60.

The control of locked high radiation areas will be assumed solely by the Radiation Protection department which will enhance program accountability. This transfer of control was made on March 9, 1992.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

To ensure near term effectiveness, focussed management oversight of the program implementation will be provided through the end of 1992. Program adjustments will be made as necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved upon implementation of the revised high radiation area control program on March 9, 1992.