

Commonwealth Edison Company
Quad Cities Generating Station
22710 206th Avenue North
Cordova, IL 61242-9740
Tel 309-654-2241



ESK 96-074

May 16, 1996

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Quad Cities Power Station Units 1 and 2;
NRC Docket Number 50-254 and 50-265;
NRC Inspection Report Numbers 50-254(265)/96002

Reference: B. Clayton Letter to E. S. Kraft, Jr., Dated April 17, 1996,
Transmitting Notice of Violation

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violation transmitted with the referenced letter. The NOV cited three Severity Level IV violations: (1) Failure to perform a Technical Specification review of a temporary procedure change, (2) Licensee breached primary containment integrity while above 212 degrees, and (3) Improper storage of diesel generator air start motors, without implementing controls for moisture control.

The following commitments are being made by this letter:

For Violation 254/265-96-002-01:

1. QCAP 1100-13 will be revised to require a determination as to whether the proposed change to the procedure changes its intent.

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For Violation 254/265-96-002-02:

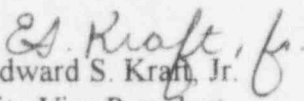
1. Training lesson plans associated with Technical Specification 3.0.A requirements will be revised to include NRC Generic Letter 87-09 guidance associated with intent and application of this specification.
2. A review will be performed of NRC Generic Letters which initiated Technical Specification requirements or provided interpretation of Technical Specifications to determine if appropriate guidance is contained in the operating procedures and/or training materials.

For Violation 254/265-96-002-08:

1. Revise QCAP 1400-22 to ensure Preventive Maintenance(PM) data is entered into inventory computer system. Sample safety-related PM evaluations to ensure inventory computer PM data have been entered.

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,


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

Attachment: (A) NOV responses

cc: H. J. Miller, Regional Administrator, RIII
R. M. Pulsifer, Project Manager, NRR
C. G. Miller, Senior Resident Inspector, Quad Cities
D. C. Tubbs, MidAmerican Energy Company
R. J. Singer, MidAmerican Energy Company

ATTACHMENT A

STATEMENT OF VIOLATION

VIOLATION 254/265-96-002-01

Quad Cities Technical Specification Section 6.2.C. outlines review procedures for changes to procedures required by Technical Specification 6.2.A. Specification 6.2.D.1. allows temporary changes to a procedure if the original intent is not altered.

Contrary to the above, on February 10, 1996, the licensee implemented procedure field change number QCTS 600-18-PFC-2024, a temporary procedure change for Unit 1, without performing the review required by Technical Specification 6.2.C. Procedure field change QCTS 600-18-PFC-2024 altered the original intent of procedure QCTS 600-18 "RHRS Suppression Chamber Spray Local Leak Rate Test (MO-1(2)-1001-34A/B, 36A/B, and 37A/B)."

This is a severity level IV violation (Supplement 1).

REASON FOR VIOLATION:

This violation was caused by an inadequacy in the screening checklist which is used in QCAP 1100-13, "Procedure Field Change," to determine that no change of intent is involved. The screening checklist addresses nine specific questions and does not require evaluation of whether the procedure change will allow the procedure to be performed in a different operating mode or condition than had been previously evaluated for acceptability.

CORRECTIVE ACTIONS TAKEN:

Operating orders were issued to all SRO license holders which restricts the use of the PFC process to revise procedure prerequisites. Current guidance prevents revising a prerequisite such that the procedure would be allowed to be used in a less conservative operating mode, i.e.; changing the prerequisite from "no fuel in the vessel" to "all control rods fully inserted."

ACTIONS TO PREVENT FURTHER OCCURRENCE:

QCAP 1100-13 will be revised to require a determination as to whether the proposed change to the procedure changes the intent of the original procedure. The checklist will be retained but the procedure will caution that the list of items in the checklist are only examples of items which can change the intent of the procedure. This procedure revision will be completed by June 28, 1996 (NTS # 254-100-96-00201.01).

DATE WHEN FULL COMPLIANCE WILL BE MET:

Full compliance will be met on June 28, 1996, following completion of the revision to QCAP 1100-13.

STATEMENT OF VIOLATION

VIOLATION 254/265-96-002-02

Technical Specification 3.7.A.2 states, "Primary containment integrity shall be maintained at all times when the reactor is critical or when the reactor water temperature is above 212 degrees F and fuel is in the reactor vessel."

Contrary to the above, on February 10, 1996, with the Unit 1 reactor water temperature above 212 degrees F and fuel in the reactor vessel, the licensee breached primary containment integrity on 4 occasions.

This is a severity level IV violation (Supplement 1).

REASON FOR VIOLATION:

The cause of this violation was insufficient knowledge on the part of Operating personnel concerning the guidance in Generic Letter 87-09 with respect to the intent and application of Technical Specification 3.0.A. Since voluntary entry into this specification was seen as an option, the Primary Containment to Secondary Containment flowpath was opened, contrary to the requirements of Technical Specification 3.7.A.2.

CORRECTIVE ACTIONS TAKEN:

A policy statement was issued by the Operations Manager that clarified expectations for use and entry into Technical Specification 3.0.A.

This event has been presented to all current license holders in license requalification training. This event has also been presented to all current license candidates enrolled in initial license training. This training was completed on May 10, 1996.

ACTIONS TO PREVENT FURTHER OCCURRENCE:

Training lesson plans associated with Technical Specification 3.0.A requirements will be revised to include NRC Generic Letter 87-09 guidance associated with intent and application of this specification. These revisions will be completed by July 31, 1996 (NTS # 254-100-96-00202.01).

A review will be performed of NRC Generic Letters which initiated Technical Specification changes or provided interpretation of Technical Specification requirements to determine if appropriate guidance is contained in the operating procedures and/or training materials. This review will be completed by July 31, 1996 (NTS # 254-100-96-00202.02).

DATE WHEN FULL COMPLIANCE WILL BE MET:

Full compliance with the Technical Specification was met on February 10, 1996 following closure of the manual test tap isolation valves.

STATEMENT OF VIOLATION

VIOLATION 254/265-96-002-08

Criterion XIII of Appendix B to 10 CFR 50, "Handling, Storage and Shipping," states: "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration. When necessary for particular product, special protective environments, such as inert gas atmosphere, specific moisture content levels, and temperature levels, shall be specified and provided."

Contrary to the above, the licensee improperly stored standby diesel generator air start motors, without implementing controls for a special protective environment to control specific moisture content levels. A 10 CFR Part 21 notification, 10 CFR 21-0045, dated April 28, 1989, was issued to the licensee identifying adverse effects of moisture on the carbon vanes of the standby diesel generator air start motors, and ComEd did not take appropriate action.

This is Severity Level IV violations (Supplement 1).

REASON FOR VIOLATION:

The reason for the violation was personnel error. The evaluation for the proper storage of motors (which was initiated in 1989), was misplaced by the entry clerk and thus not entered into the stores inventory computer system.

CORRECTIVE ACTIONS TAKEN:

Station initiated PIF 95-2982, which covered entering the storage data into the inventory system computer, ensuring that the on-hand stock was acceptable, and repackaged to correct storage requirements. The affected individual was counseled on proper handling of evaluation information. This was also tailgated as an expectation to all stores personnel.

ACTIONS TO PREVENT FURTHER OCCURRENCE:

The inventory system computer has the ability to identify the storage requirements at receipt and when periodic inspection is due. The air start motor data has been entered so that this feature has been activated. The procedures for establishing PM information will be modified to ensure the criteria was entered into the inventory system. A random sample of other safety-related PM data will be reviewed to verify entry (NTS # 254-100-96-00208.01).

DATE WHEN FULL COMPLIANCE WILL BE MET:

Full compliance was achieved with the completion of all actions on December 15, 1995.