

Commonwealth Edison Company  
Quad Cities Generating Station  
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ESK 96-136

July 3, 1996

U.S Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Quad Cities Station Units 1 and 2;  
NRC Docket Numbers 50-254 and 50-265;  
NRC Inspection Report Numbers 50-254/96004 and 50-265/96004.

Reference: W. L. Axelson Letter to E. S. Kraft, Jr., Dated June 5, 1996,  
Transmitting Notice of Violation.

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violation (NOV) transmitted with the referenced letter. The NOV cited one Severity Level IV violation concerning the failure of the Operating Department to properly evaluate and control equipment Out-of-Service (OOS) request activities on the Unit 1/2 Emergency Diesel Generator and train "B" of the Primary Containment Isolation (PCI) system.

This letter has no commitments. All actions stated in the response have been documented as completed.

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

Respectfully,

  
E. S. Kraft, Jr.  
Site Vice President

Attachment (A), Response to Notice of Violation

cc: H. Miller, NRC Regional Administrator, RIII  
R. Pulsifer, NRC Project Manager, NRR  
C. Miller, Senior Resident Inspector, Quad Cities  
D. C. Tubbs, Mid-American Energy Company  
R. Singer, Mid-American Energy Company

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## **RESPONSE TO NOTICE OF VIOLATION**

### **STATEMENT OF VIOLATION:**

Technical Specification 6.2.A.1 required written procedures be established and implemented for applicable procedures in Regulatory Guide 1.33, Rev. 2, Appendix A. Regulatory Guide 1.33 Paragraph 1.c. lists Equipment Control procedures (e.g., locking and tagging).

Licensee procedure QCAP 230-4, "Equipment Out of Service," Rev. 14, Step D.1.f.1.(c) required OOS reviewers review OOS activities to ensure operational concerns associated with the activity are identified.

- a. The OOS reviewers documented the shared diesel generator would be operable to Unit 2 for OOS numbers 19190, 19698, 18862 and 19187.

Contrary to the above, on February 29, 1996, initiation of OOS numbers 19190, 19698, 18862 and 19187 rendered the shared diesel generator inoperable to Unit 2. An operational concern associated with the activity was not identified.

Licensee procedure QCAP 230-4, "Equipment Out of Service," Rev. 14, Step D.1.g.2 required unit supervisors review OOS activities to ensure plant conditions are correct to support the activity.

- b. The unit supervisor initiated OOS Number 19285 which required Unit 1 Primary containment isolation system, train "B" be operable.

Contrary to the above, on March 15, 1996, the unit supervisor initiated OOS Number 19285 with Unit 1 primary containment isolation system train "B" inoperable. A condition not correct to support the activity.

### **REASON FOR VIOLATION:**

The primary cause of this violation was personnel error. In the first example, the preparer and reviewer of the out of service documentation both failed to identify all affected portions of the electrical circuit that was being de-energized. As a result, the individuals both failed to identify the total affect on the 1/2 Diesel Generator automatic start function. In the second instance, the Unit Supervisor and the Nuclear Station Operator verified Reactor Protection System relays instead of the appropriate Group II isolation logic relays to ensure that an automatic actuation would not occur.

## **RESPONSE TO NOTICE OF VIOLATION**

### **CORRECTIVE ACTIONS TAKEN:**

Appropriate disciplinary action was administered to the personnel involved in these events.

### **ACTIONS TO PREVENT FURTHER OCCURRENCE:**

Selected diesel generator procedures have been revised to include limitations and actions describing the impact of removing the fuses for the 1/2 diesel generator automatic start relay.

These events have been presented to all licensed operators during licensed operator retraining.

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

For item (a) above, compliance was met on March 4, 1996, following installation of the 1/2 Diesel Generator automatic start relay fuse. For item (b) above, compliance was met on March 15, 1996, following re-energization of RPS A and restoration of reactor building ventilation.