



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

November 17, 1992

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-254/92022; 50-265/92022
NRC Docket Nos. 50-254 and 50-265

Reference: B. Clayton letter to Cordell Reed dated October 21, 1992
transmitting NRC Inspection Report Nos. 50-254/92022;
50-265/92022.

Enclosed is the Commonwealth Edison Company (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter. The NOV cited two examples of surveillance procedures where the prerequisites were not adequate to ensure proper performance of the surveillance. CEC's response to the above items is provided in the attachment.

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

Sincerely,

P. L. Bames
for

T.J. Kovach
Nuclear Licensing Manager

Attachment

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

9211240149 921117
PDR ADOCK 05000254
G PDR

ZNLD/2307/1

JED

**RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-254/92022; 50-265/92022**

VIOLATION: (254/92022-01a; 01b)

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings", requires, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Contrary to the above:

- a. On September 2, 1992, the technical specification requiring surveillance for turbine control valve fast closure was not performed in accordance with a documented procedure. Specifically, QOS 5600-1 "Turbine Control Valve Fast Closure Scram Instrumentation Functional Test" did not address adjusting the electro-hydraulic control load set at low power levels, an activity affecting quality since reactivity changes can occur from an improper adjustment.
- b. On September 4 and 5, 1992, the technical specification required surveillance for drywell air sampling, an activity affecting quality, was not performed in accordance with a documented procedure. Specifically, on September 4, 1992, following completion of the sample, the sample inlet and discharge valves were closed, although this activity was not documented in surveillance procedure as QCP 1300-1 "Drywell and Suppression Chamber Venting and Purging". On September 5, 1992, the sample inlet valve was opened but the discharge valve position was not verified. Verification of correct valve lineup prior to taking the sample was not discussed in QCP 1300-1.

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

REASON FOR VIOLATION: (Example A)

CECo acknowledges that the test procedure did not contain guidance on the proper adjustment of the load set to ensure that the bypass valves would not open during performance of the test.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED: (Example A)

QOS 5600-1, "Turbine Control Valve Fast Closure Scram Instrumentation Functional Test", has been revised to include two additional steps. First, a precaution has been added to advise the Nuclear Station Operator of the reactor pressure and power increase which will result from the closure of the control valves. Second, a limitation and action statement has been added to ensure that the load set is approximately 20% above actual turbine-generator load prior to performance of the surveillance.

**CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:
(Example A)**

No further corrective steps are required.

**RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-254/92022; 50-265/92022
(Continued)**

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED: (Example A)

Full compliance was achieved on October 14, 1992 when the procedure change to QOS 5600-1 was implemented.

REASON FOR VIOLATION: (Example B)

CECo acknowledges that the surveillance procedure did not address verification of valve positions prior to taking the sample. Because the valves are normally in an open position the procedure assumed the valves to be open. Flow was seen due to a loose hose in the Containment Air Monitor (CAM) providing a flow path for the September 5, 1992 samples.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED: (Example B)

QCP 1300-1, "Drywell and Suppression Chamber Venting and Purging", has been revised. A prerequisite of sampling the drywell requires the air sample and sample return valves to be in the open position or to contact operators to see if the sample can be obtained. QCP 1300 S1, "Drywell and Torus Venting and Purging Calculation Sheet", was also revised to verify that the air sample and return valves are in the open position. The drywell air sample event of September 5, 1992 was discussed at a weekly tailgate meeting with Chemistry personnel.

**CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:
(Example B)**

No further corrective steps are required.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED: (Example B)

Full compliance was achieved on October 6, 1992 when procedure QCP 1300-1 was revised and implemented.