



Commonwealth Edison

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Address Reply to: Post Office Box 767
Chicago, Illinois 60690

May 1, 1985

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

Subject: Quad Cities Station Units 1 and 2
Response to Inspection Report Nos.
50-254/85-009 & 50-265/85-010
NRC Docket Nos. 50-254 & 50-265

Reference (a): W. S. Little letter to Cordell Reed
dated April 1, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. P. R. Wohld on March 18 thru 22, 1985 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,


D. L. Farrar

Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - Quad Cities

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ATTACHMENT

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

As a result of the inspection conducted from March 18 through March 22, 1985, at Quad-Cities Station, the following violation was identified:

Item of Noncompliance

1. 10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Corporate Quality Assurance Manual, Chapter 5, states that measures to assure that activities affecting quality shall be prescribed by documented instructions.

Contrary to the above:

- a. The licensee did not have administrative instructions assigning responsibility for implementation of the pump and valve inservice test program under Section XI of the ASME code.
- b. Instructions prescribing test program technical details were not adequate in specifying requirements to meet the ASME Code.
- c. The use of pump and valve inservice test data (such as for trending analysis and evaluation) was not prescribed by instruction to assure the prompt identification and correction of conditions adverse to quality.

Corrective Actions Taken and Results Achieved

The QAP 350 series of inservice testing program administrative procedures which provide program technical instruction are being revised. Changes to these administrative procedures include the following:

1. Assign the overall responsibility for the Inservice Testing Program to the IST Coordinator, which includes maintaining a program of trending appropriate test data.
2. Assign the responsibilities of initial operability determination and initiating corrective actions as appropriate to the Station Control Room Engineer.

3. Specify that the first valve stroke will be used as the surveillance test stroke time for the record, for initial operability determination, and for trending.
4. Specify that the corrective action for valve testing required at cold shutdown will include an evaluation by the Station Control Room Engineer. If the evaluation indicates a valve to be inoperative, the condition will be corrected before startup. A retest showing acceptable operation shall be run following any required corrective action before the valve is returned to service.
5. Revise the procedure valve lists, QAP 350-S3 and S4, to include all applicable valves that are in the IST program.

The Station Modification Checklist, QTP 500-S8, is to be revised to identify the requirement for IST review for adding or modifying testing as a result of plant design changes and modifications.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

A station IST Coordinator will be designated. He will ensure the long term viability of the Inservice Testing Program.

Date When Full Compliance Will Be Achieved

Partial compliance will be achieved by June 30, 1985, when a station IST Coordinator is designated.

Full compliance will be achieved by August 1, 1985, when all necessary procedural changes are implemented.