



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

December 9, 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. 50-254/92027; 50-265/92027
NRC Docket Nos. 50-254 and 50-265

Reference: C. Pederson letter to C. Reed dated November 12, 1992
transmitting NRC Inspection Report Nos. 50-254/92027;
50-265/92027

Enclosed is the Commonwealth Edison Company (CECo) response to the Notice of Violation (NOV) transmitted with the reference letter. The NOV cited a failure to follow transportation requirements, transfer of radioactive material to an unauthorized recipient, and a failure to follow procedures. CECo's response 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. Barnes 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

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RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-254/92027; 50-265/92027

VIOLATION 254(265)/92027-01

10 CFR 71.5(a) requires that licensees, who transport licensed material outside the confines of their plants or deliver licensed material to a carrier for transport, comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Part 170-189.

49 CFR 173.443(c) requires, in part, that each vehicle used for transporting radioactive materials as an exclusive use shipment be surveyed with appropriate radiation detection instruments after each use.

Contrary to the above, on September 16, 1992, a truck used to transport four shipping canisters containing radioactive material as an exclusive use shipment to the licensee was not surveyed with appropriate radiation detection instruments after use.

This is a Severity Level IV problem (Supplement V).

REASON FOR VIOLATION

CECo acknowledges the violation. As a result of a lack of clear communication and formal assignment of responsibility, a truck delivering a radioactive material exclusive use shipment was allowed to leave the Quad Cities Station and return to non-exclusive use status prior to receiving a complete departure survey.

On September 16, 1992 a truck with four shipping canisters arrived at the station and received an arrival survey by Radiation Protection personnel. This survey verified that the shipment met all DOT limits for transport and receipt. The shipment was later unloaded by other licensee personnel into a receiving area outside of the station protected area. These personnel have limited experience with radioactive material shipping, and most shipments are unloaded inside the protected area where they are controlled with the use of a "Vehicle Disposition Form" which requires Radiation Protection Department permission prior to release from the protected area. The truck subsequently left site after four shipping canisters were unloaded. The area directly beneath the shipping container had not been surveyed, but because the shipping containers themselves were free from radioactive contamination, the floor of the shipping vehicle could not have been contaminated.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

1. The transport vehicle was located the following morning on September 17, 1992. The required departure survey was completed which verified that the vehicle met all DOT limits.
2. Quad Cities instituted a policy that all trucks delivering exclusive shipments will either be unloaded inside the protected area where they will be controlled through the use of the vehicle disposition form, or if unloaded outside the protected area, Radiation Protection will remain in constant attendance to ensure that all DOT requirements are completed prior to release from site.

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-254/92027; 50-265/92027

Violation 254(265)/92027-01 (cont'd)

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

1. The visual aids used by personnel in the receiving areas have been enhanced to provide clearer instructions on the responsibility for control and notifications required for different types of radioactive material shipments.
2. The Vehicle Control Procedure will be revised to address requirements for all shipments at the station. This includes assigning clear responsibility for completing the requirements for shipments received both inside and outside the protected area. The temporary policy requiring constant Radiation Protection attendance for shipments unloaded outside the protected areas will remain in effect until the procedure revision is approved, and affected personnel are trained on the new procedure.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on 09/17/92 when the departure survey was completed and the policy requiring Radiation Protection attendance during outside the protected area was implemented.

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-254/92027; 50-265/92027

VIOLATION 254(265)/92027-02

10 CFR 30.41(a) and (b)(5) require, in part, that no licensee transfer byproduct material except to a person authorized to receive such byproduct material under the terms of a specific or general license issued by the Commission or Agreement State.

Contrary to the above, on August 4, 1992, the licensee transferred a flow transmitter contaminated with byproduct material to a manufacturer vendor who was not authorized to possess the byproduct material under the terms of a specific or general license issued by the Commission or Agreement State.

This is a Severity Level IV problem (Supplement IV).

VIOLATION 254(265)/92027-03

Technical Specification 6.2.B requires that radiation control procedures be maintained, made available to all station personnel, and adhered to.

Quad Cities Radiation Protection Procedure QRP 1000 requires that removal of material without restrictions from a controlled area requires an unconditional release survey.

Contrary to the above, on or around July 7, 1992, an unconditional release survey was not performed of a flow transmitter that was removed without restrictions from a controlled area.

This is a Severity Level IV Problem (Supplement IV).

REASON FOR VIOLATION 254(265)/92027-02, 03)

CECo acknowledges the violation. As a result of incomplete understanding of station procedures, a contracted individual packaged a flow transmitter for shipment without requesting an unconditional release survey. This transmitter was later identified as having low levels of fixed radioactive contamination after arrival at an unlicensed vendor site.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

1. Station personnel provided verbal instructions to the vendor on methods to survey the work areas, where the transmitter had been stored. These surveys indicated that no radioactive material had spread to the vendor's work areas. These vendor surveys were performed on the first business day after notification of the incident, September 21, 1992. These surveys were subsequently verified by licensee personnel who traveled to the vendor's location for the purpose of discussing this incident and surveying the work area. This second survey was performed on September 22, 1992.
2. Areas at the Quad Cities Station, where items are stored after removal from radiation controlled areas, were surveyed to ensure that items were properly marked to prevent the shipment of radioactive materials without the DOT required controls.

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-254/92027; 50-265/92027

Violation 254(265)/92027-02 (cont'd)

3. Items already packaged for shipment were reviewed by Radiation Protection personnel to determine if they had previously received the proper radiological survey. No items were identified which did not comply with station unconditional release requirements.
4. Contracted personnel with shipping responsibilities were interviewed to ensure they understood the station requirement for an unconditional release survey on any item which had been in the radiation controlled area prior to shipment from the station. All personnel interviewed demonstrated a clear understanding of station procedures regarding unconditional release surveys.
5. On a daily basis, Radiation Protection management personnel review items in the stores area which are packaged for shipment to verify that the proper radiological survey is performed prior to release from the station. This review will continue until additional corrective actions listed as numbers one and two below are implemented.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

1. Stores department procedures will be revised to require that shipping personnel verify an unconditional release tag is attached to any item prior to shipment off-site for repair or analysis. (Transfer of unused items which have not left the stores department will not require unconditional release tags).
2. Stores department procedures will be revised to require an unconditional release tag prior to accepting the return of material into the Stores department if the material was previously in a radiation controlled area.
3. The general controls on radioactive material will be evaluated by a task force made up of corporate and station personnel to determine what additional actions can be taken to improve the existing program.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on September 22, 1992 when initial corrective actions were implemented, and the vendor site was verified as free from radioactive material.