

**Commonwealth Edison**

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February 15, 1985

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Mr. James G. Keppler  
 Regional Administrator  
 United States Nuclear  
 Regulatory Commission  
 Region III  
 799 Roosevelt Road  
 Glen Ellyn, Illinois 60137

Re: Quad Cities Nuclear Power Station, Units 1  
 and 2, Docket Nos. 50-254, 50-265

Dear Mr. Keppler:

By letter dated December 12, 1984, the NRC requests, in addition to a response pursuant to 10 CFR §§ 2.201 and 2.205 to the enclosed Notice of Violation, a response to certain matters of concern. Specifically, the matters of concern identified are: (1) that the SCRE did not exercise adequate control of control room operators in that prior to the Shift Engineer's arrival, the SCRE did not recognize that Unit 1 was unattended during the event; (2) it took approximately 30 minutes for the control room staff to identify the failure of one control rod to insert from the "full out" position; and (3) the SCRE did not advise the Shift Engineer in a timely manner of the events that occurred immediately prior to and after the unit scram. In addition, it is requested that Edison's response address the immediate and long-term corrective actions that will be taken to strengthen the supervision of control room operations. This letter is in response to your requests.

With regard to item 1 above, as discussed more fully in the letters sent pursuant to 10 CFR §§ 2.201 and 2.205, Edison believes that the conduct of the Unit 1 operator, which is the subject of the enforcement proceeding, was consistent with the provisions of 10 CFR § 50.54(k) and the Quad Cities operating procedures. Thus, Edison disagrees with the NRC's premise that Unit 1 was unattended, and under the procedures the Company would not have expected that the SCRE take action in response to the Unit 1 operator's conduct. As we also explain in the 2.201 and 2.205 letters, Edison has issued a new Conduct of Operations Directive which we believe is consistent with the NRC's announced interpretation of 10 CFR § 50.54(k). The new Directive has been furnished

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to the SCREs at all of Edison's nuclear facilities as well as to other operating personnel. In addition, with regard to Quad Cities specifically, the station operating procedures will be modified to implement the guidance contained in the Conduct of Operations Directive. These new procedures identify specific boundaries in the control rooms for each of Edison's nuclear facilities within which an operator is normally expected to remain and provide detailed guidance regarding the circumstances when an operator may assist a fellow operator within the limitations of the regulations and the steps which must be taken prior to rendering such assistance. Consequently, in the event an operator fails to comply with the new procedures, the SCRE should recognize this fact and act to remedy the situation.

With regard to the second item of concern identified above, Edison management has required that all operating personnel be instructed to make sure that a review of the full core display panel is performed following a scram and to verify the accuracy of the full core display panel by means of the computer scan which identifies the position of control rods. The stations have also instructed their operating personnel to ensure that all rods have been fully inserted during scrams. In addition, as you know, the Quad Cities control room is currently the subject of a human factors review in response to NRC Supplement I to NUREG-0737. The Human Factors Review Group has been requested to pay special attention to this incident in reviewing the Quad Cities control panel.

With respect to item (3) above, during a meeting on October 31, 1984 with the Quad Cities site management and the SCREs, the SCREs were instructed to immediately notify the Shift Engineer of unexpected events or abnormal occurrences. In addition, as discussed below, the newly issued Conduct of Operations Directive addresses the role of the SCRE during reactor scrams.

Although Edison believes that the corrective actions discussed above adequately resolve the specific concerns raised in your letter, the concerns, taken together, prompted a detailed review of control room operations and has resulted in modifications to procedures to clarify the responsibilities of control room personnel.

The principal modification, which has already been implemented at the Quad Cities plant, involves the responsibilities of SCREs during unusual events. Edison has come to recognize that due to the relative inexperience of the SCREs in responding to emergency situations, the SCREs are not particularly well suited for direct supervisory responsibilities during such events. Thus, Edison's Conduct of Operations Directive was modified to require that upon the

occurrence of an unusual event, the SCRE is to turn over direct supervisory responsibilities for control room operations to the Shift Engineer or Shift Foreman. At that point, the SCRE is no longer considered the control room supervisor and instead becomes the Shift Technical Advisor. Under this organization, the control room will still benefit from the SCRE's technical expertise and an individual with a greater amount of operating experience is responsible for supervision of control room operations. As stated above, this change has already been implemented at Quad Cities.

A second response to the concern regarding control room operations consisted of the formation of a Shift Organization Task Force specifically assigned the responsibility for reviewing and making recommendations regarding the interface between control room operating personnel. On January 9, 1985 this Task Force issued a report which identified a number of potential problem areas regarding control room operations and contained a number of interim and long-term recommendations for changes to the conduct of control room operations. These recommendations are currently being studied by Edison management. It is expected that following Edison's review, changes to the shift organization and assigned responsibilities of various control room personnel will be implemented.

Edison hopes that this letter is sufficiently responsive to the NRC's inquiries. We would be happy to respond to any further questions you may have regarding these matters.

Very truly yours,



Cordell Reed  
Vice President

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