



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

DCS

September 23, 1985

Mr. James M. Taylor, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Quad Cities Station Unit 1  
Imposition of Civil Penalty  
License No. DPR-29, EA 84-123  
NRC Docket No. 50-254

References (a): J. M. Taylor letter to J. J. O'Connor  
dated August 9, 1985.

(b): J. M. Taylor letter to J. J. O'Connor  
dated September 12, 1985.

Dear Mr. Taylor:

We have received the reference (a) letter and Order dated August 9, 1985 regarding the subject enforcement proceeding. In prior correspondence, Edison provided the NRC its detailed evaluation of the facts underlying the alleged violation, the reasons the Company does not believe that the imposition of a civil penalty is warranted in this case, and the corrective actions taken by the Company in response to the NRC's inspection and findings. Having reviewed the NRC's evaluation of the Company's response, Edison continues to maintain that the conduct of the Unit 1 operator did not jeopardize the safe operation of the facility. Moreover, we reiterate that the operator's actions were in compliance with station procedures as historically interpreted. This event represents a question of interpretation of procedural and regulatory requirements and is not a case of failure to adhere to operating procedures as indicated in the reference (a) letter.

Nonetheless, Commonwealth Edison has instituted new procedural requirements to prevent a recurrence of this event at Quad Cities or any other of our stations.

We are enclosing a check in the amount of Fifty Thousand Dollars (\$50,000) payable to the Treasurer of the United States, in accordance with the above-mentioned Order. This response is provided consistent with the two week extension of the Order granted by yourself in Reference (b).

Sincerely,

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PDR ADOCK 05000254  
Q PDR

*Cordell Reed*

Cordell Reed  
Vice-President

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Enclosure

cc: J. G. Keppler - Region III  
Quad Cities Resident Inspector

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