



Commonwealth Edison

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September 12, 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 Unit 2
Response to Inspection Report
No. 50-265/85-023
NRC Docket No. 50-265

Reference: Letter from J. J. Harrison to Cordell
Reed dated August 13, 1985

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Ms. P. R. Rescheske and Mr. S. G. DuPont on July 8 through 19, 1985, of activities at Quad Cities Station Unit 2. The referenced letter 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 July 8 through July 19, 1985, at Quad-Cities Station, the following violation was identified:

ITEM OF VIOLATION

10 CFR 50, Appendix B, Criterion V, as implemented by the CECO Quality Assurance Manual (Q.R. No. 5.0 and Q.P. No. 5-51), states, in part, that activities affecting quality shall be prescribed by appropriate written procedures. Contrary to this, a number of procedures were identified in which the instructions or the data sheets were inappropriate for performing the required test.

- a. Procedure QTS 1512-1, "Nuclear Engineer's Method for APRM Calibration," required form QTS 1512-S1 to be completed as part of the test performed on June 6, 1985. This form was inappropriate in that it did not indicate the person who performed the test or specify the date and Unit (1 or 2) on which the test was performed (265/85023-01a(DRS)).
- b. Procedure QOS 700-6, "APRM High FLux (Heat Balance) Calibration Test," required form QOS 700-S4 to be completed with the use of the nomograph QOS 700-S6 to perform a hand heat balance calculation. This method was inadequate due to the complexity of the instructions and the inaccuracies of the nomograph (265/85023-01b(DRS)).
- c. Procedure QTS 130-1, "Control Rod Timing and Position Indication Check," required data sheet QTS 130-S1 to be completed as part of the test performed subsequent to core load. This procedure was inadequate in that it did not clearly state that the verification or rod position indication, as required by Technical Specifications, should be documented on the data sheet and hence this verification was not recorded (265/85023-01c(DRS)).
- d. Procedure QTP 1106-2, "Initial In-Sequence Criticality Estimate Evaluation," required form QTP 1106-S3 to be completed as part of the test performed on June 5, 1985. This procedure and data sheet were inappropriate in that only the results of the calculation were required to be recorded on the data sheet; an approved method for the initial criticality evaluation was not specified (265/85023-01d(DRS)).
- e. Procedure QTP 1600-3, "Flow Control Line Determination," required data sheet QTP 1600-S8 to be completed as part of the test performed on June 14, 1985. This data sheet was inappropriate in that it did not indicate the person who performed the test or specify the date and Unit (1 or 2) on which the test was performed (265-85023-01e(DRS)).

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

As a result of the identification of several procedural shortcomings by the Station and the NRC inspection team, the following procedure changes have been initiated:

QTS 1512-S1, "Low Power APRM Calibration" data sheet is being revised to include blanks for unit, date, time, and names of person completing the form and Instrument Mechanic performing calibration.

QOS 700-6, "APRM High Flux (Heat Balance) Calibration Test" is being revised to delete the hand/nomograph method for calculating core thermal power since numerous more accurate backup methods for calculating core power are available to the Nuclear Engineers and Reactor Operators. The associated checklists QOS 700-S4 and QOS 700-S6 are also being deleted.

QTS 130-1, "Control Rod Timing and Position Indication Check" and associated data sheet QTS 130-S1 are being revised to specify how control rod position verification is to be documented.

QTP 1106-2, "Initial In-Sequence Criticality Estimate Evaluation" and associated data sheet QTP 1106-S3 are being revised to specify the preferred method for obtaining reactivity values from fuel vendor-supplied information.

QTP 1600-S8, "Flow Control Line Determination" checklist is being revised to include blanks for unit, date, and person completing the checklist.

In addition, the following procedure changes are also in progress:

QTS procedure block 1311, "LPRM's" is being revised to incorporate changes necessitated by the recent process computer change out. A method for returning LPRM's to "operate" is being added to QTS 1311-4, "Bypassing LPRM's".

QTS procedure block 1512 "APRM Calibration" is being revised to eliminate the requirement to collect extraneous computer printouts while performing the various procedures.

QTS-130-1, "Control Rod Timing and Position Indication Check" is being revised to include notch out testing as an alternate acceptance criterion for a time that is outside the 48 to 60 second interval presently specified. Also, the method for re-timing a control rod after an adjustment has been made to either the insert or withdrawl time will be clarified. Space will be provided on data sheet QTS 130-S1 to document separately the date and person performing each test on the individual control rods.

QTS 130-3, "Control Rod Friction and Settle Testing" is being changed to delete the oscilloscope method and to define the DP cell operation method in the appropriate section of the revised procedure.

QTS 1300-1, "Operating Rod Inventory Comparison for Reactivity Anomaly Surveillance" is being changed to incorporate a new data sheet for performing the surveillance by hand.

QTS-1110-1, "IRM Performance Check" is being changed to include a reference to checklist QTP 1512-S1 for optional use while performing this procedure.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Every procedure used at Quad-Cities Nuclear Power Station receives a periodic review at a frequency of about every four years. Recently, guidance has been provided to personnel performing this review as to what the review of a procedure should include. This guidance is in the form of a list of standard items to examine each procedure against. This enhancement in the procedure review process will improve the thoroughness of future reviews and help to identify and correct deficiencies.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The appropriate changes to all the procedures listed in the Notice of Violation and those procedures dealing with startup testing that were listed in the Inspection Report will be implemented prior to January 1, 1986. This is well before the next scheduled startup following a refueling outage which is first time these procedures will again be needed.

Changes to all other procedures listed in the Inspection Report (principally the QTS 1311 block dealing with LPRM calibration) will be implemented prior to November 1, 1985, since they are used periodically throughout the operating cycle of the units.