

January 22, 1997

Mr. E. Kraft
Site Vice President
Quad Cities Station
Commonwealth Edison Company
22710 206th Avenue North
Cordova, IL 61242

SUBJECT: NOTICE OF DEVIATION (NRC INSPECTION REPORT
NGS. 50-254/96015(DRS); 50-265/96015(DRS))

Dear Mr. Kraft:

This will acknowledge receipt of your letter dated January 10, 1997, in response to our letter dated November 22, 1996, transmitting a Notice of Deviation associated with Inspection Report Nos. 50-254/96015(DRS); 50-265/96015(DRS). This report cited a deviation concerning the failure to develop or implement a procedure to trend and analyze residual heat removal room cooler differential pressures at your Quad Cities Plant. We have reviewed your corrective actions and have no further questions at this time. These corrective actions will be examined during future inspections.

Sincerely,

/s/ M. Leach (for)

9701280231 970122
PDR ADDCK 05000254
G PDR

Geoffrey E. Grant, Director
Division of Reactor Safety

Docket No. 50-254
Docket No. 50-265

Enclosure: Ltr 01/10/97 E. S. Kraft, Jr.
ComEd, to US NRC w/encl

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SEE ATTACHED CONCURRENCES

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NAME	Duncan/kjc		Hiland		Ring		Grant	
DATE	01/21/97		01/22/97		01/27/97		01/22/97	

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Mr. E. Kraft
Site Vice President
Quad Cities Station
Commonwealth Edison Company
22710 206th Avenue North
Cordova, IL 61242

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Sincerely,

Mark A. Ring, Chief
Lead Engineers Branch

Docket No. 50-254
Docket No. 50-265

Enclosure: Ltr 01/10/97 E. S. Kraft, Jr.
ComEd, to US NRC w/encl

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NAME	Duncan/kjc		Hiland <i>pld</i>		Ring			
DATE	01/21/97		01/22/97		01/ /97			

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cc w/o encl: T. J. Maiman, Senior Vice President,
Nuclear Operations Division
D. A. Sager, Vice President,
Generation Support
H. W. Keiser, Chief Nuclear
Operating Officer
L. W. Pearce, Station Manager
C. C. Peterson, Regulatory Affairs
Manager
I. Johnson, Acting Nuclear
Regulatory Services Manager
Document Control Desk - Licensing

cc w/encl: Richard Hubbard
Nathan Schloss, Economist,
Office of the Attorney General
State Liaison Officer
Chairman, Illinois Commerce Commission
J. R. Bull, Vice President, General &
Transmission, MidAmerican Energy Company

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RIII PRR w/encl

SRIs, Quad Cities,

Dresden, LaSalle w/encl

W. Axelson, RIII w/encl

LPM, NRR w/encl

A. B. Beach, RIII w/encl

Enf. Coordinator, RIII w/encl

R. A. Capra, NRR w/encl

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Commonwealth Edison Company
Quad Cities Generating Station
22710 206th Avenue North
Cordova, IL 61242-9740
Tel 309-654-2241



ESK-97-009

January 10, 1997

U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Quad Cities Station Units 1 and 2;
NRC Docket Numbers 50-254 and 50-265;
NRC Inspection Report Numbers 50-254/96-015 and 50-265/96-015

Reference: G. Grant to E. S. Kraft, Jr. Letter dated November 22, 1996
Concerning Notice of Deviation

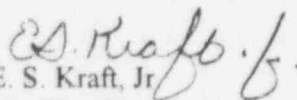
Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Deviation transmitted with the referenced letter. The report cited a deviation concerning the failure to develop or implement a procedure to trend and analyze Residual Heat Removal (RHR) room cooler differential pressures.

This letter contains the following commitment:

- 1) An administrative procedure will be implemented to describe the trending and analyzing of cooling water differential pressure from all the ECCS Room Coolers and the Diesel Generator Cooling Water Pump Cubicle Coolers.

If there are any questions concerning this response, please contact Mr. Charles Peterson, Regulatory Affairs Manager, at (309) 654-2241 extension 3602.

Respectfully,


E. S. Kraft, Jr.
Site Vice President
Quad Cities Station

Attachment (A), Quad Cities' Response to An Apparent Violation

cc: A. B. Beach, Regional Administrator - RIII
C. G. Miller, Senior Resident Inspector - Quad Cities
R. M. Pulsifer, Project Manager - NRR
R. J. Singer, MidAmerican Energy
D. C. Tubbs, MidAmerican Energy
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ATTACHMENT A
ESK-97-009

STATEMENT OF DEVIATION (NRC IR 96-015-01):

NOTICE OF DEVIATION

During an NRC inspection conducted on October 1 through November 6, 1996, a deviation of your actions committed to in Licensee Event Reports 50-254/92008 and 50-265/92007 was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the deviation is listed below:

Quad Cities Licensee Event Reports 50-254/92008 and 50-265/92007, dated April 8, and April 5, 1992, respectively, included a commitment to develop a procedure to trend and analyze Residual Heat Removal (RHR) room cooler cooling water differential pressure.

Contrary to the above, on October 3, 1996, the inspectors identified that although a procedure to measure RHR room cooler cooling water differential pressures had been developed and implemented, a procedure to trend and analyze these differential pressures had not been developed or implemented.

REASON FOR DEVIATION:

Quad Cities Station acknowledges the violation for failure to develop a procedure to trend and analyze Room Cooler cooling water differential pressures. The cause of the event was Change Management. Root Cause Investigation Reports written in the timeframe of the above mentioned Licensee Event Reports did not always enter corrective actions into the Nuclear Tracking System (NTS). In this case a NTS item was not generated to track completion of this trending procedure. Other potential problems with commitments to Generic Letter 89-13 are being reviewed.

ACTIONS TAKEN:

1. RHR room cooling water differential pressure data was reviewed and evaluated as being acceptable.
2. Problem Identification Form (PIF) 96-2849 was written to document the lack of proper trending of the ECCS Room Cooler cooling water differential pressures.
3. A five year back review was done in 1995 of NRC documents to assure committed corrective actions were either completed or tracked for completion. This item was believed to be covered under an Operating Surveillance, so it was not identified as an incomplete corrective action at that time. Since 1995, all incomplete corrective actions are completed. This process is established by the QCAP 2300 block of procedures.
4. A predefine notification has been put into the Electronic Work Control System (EWCS) to notify the System Engineer when new data has been recorded on the RHR Room Cooler Differential Pressure.

ACTIONS TO PREVENT FURTHER OCCURRENCE:

1. An administrative procedure will be implemented to describe the trending and analyzing of cooling water differential pressure data from all the ECCS Room Coolers and the Diesel Generator Cooling Water Pump Cubicle Coolers. This procedure will be implemented by the System Engineer by May 1, 1997. (NTS # 254-100-96-01501.01)

DATE WHEN FULL COMPLIANCE WILL BE MET:

All corrective actions will be completed by May 1, 1997.