

February 4, 1997

EA 96-531

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

SUBJECT: NRC INSPECTION REPORT 50-254/96017(DRP), 50-265/96017(DRP) AND  
NOTICE OF VIOLATION.

Dear Mr. Kraft:

On December 6, 1996, the NRC completed an inspection at your Quad Cities Nuclear Power Station facilities. The enclosed report presents the results of that inspection.

During the 6-week inspection period, your conduct of activities at the Quad Cities facilities was acceptable. However, based on the results of the inspection, three apparent violations were identified and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600.

The first apparent violation involves the control room emergency ventilation system (CREVS) being inoperable in excess of time limits in the Technical Specifications (TS). The CREVS was unable to maintain the required positive pressure with respect to all required adjacent areas. The second apparent violation involves the failure of a 1985 modification test and subsequent surveillance tests to ensure the CREVS would perform as described in the Updated Final Safety Analysis Report (UFSAR). The third apparent violation involves the failure to perform a required safety evaluation.

An open pre-decisional enforcement conference to discuss these apparent violations has been scheduled for February 19, 1997, at 9:30 a.m. (CST) in the Region III Office in Lisle, Illinois. The decision to hold a pre-decisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violation sooner, corrective actions, significance of the issues, and the need for lasting and effective corrective action to enable the NRC to make an informed enforcement decision.

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During the enforcement conference we expect you to address: (1) the circumstances resulting in the apparent violations, (2) your methods to ensure equipment testing incorporates design specifications such as those described in the UFSAR, (3) an apparent reluctance to perform safety evaluations for degraded equipment conditions, and (4) how degraded equipment is evaluated to meet functional and license basis requirements. These discussions should not be limited solely to the CREVS.

In addition, this is an opportunity for you to point out any errors in our inspection report and for you to provide any additional information concerning your perspectives on: (1) the severity of the violations, (2) the application of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and (3) any other application of the Enforcement Policy to this case, including the exercise of discretion in accordance with Section VII.

In accordance with the Enforcement Policy, no Notices of Violation are presently being issued for these inspection findings. Please be advised that the number and characterization of the apparent violations described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding the apparent violations is required at this time.

In addition to the concerns described above, three violations of NRC requirements were identified this period. The first violation involves the use of improper pump casing bolts in safety-related pumps. Although the condition was identified by station personnel and subsequent actions to correct the problem were commendable, this condition appeared to be similar to other problems related to the control and issuance of safety-related parts. While the short term corrective actions were aggressive, long term actions which included both station and corporate actions, have not been demonstrated. Based on this lack of comprehensive corrective action to prevent recurrence, the NRC has chosen not to exercise the discretion outlined in Section VII.B.1 of the Enforcement Policy.

The second violation, identified by the inspectors, involved the station's failure to report that the plant was operating in a condition prohibited by TS as required by 10 CFR 50.73. The third violation involved identification by the inspectors that your surveillance and testing program did not incorporate appropriate requirements to ensure TS requirements were being met.

In addition to the violations, the inspectors identified that your maintenance practices did not always consider appropriate considerations of risk to reactor safety. This resulted in the dual plant power operations for extended periods with abnormal equipment lineups and without proper attention to the importance of the maintenance activity or scheduling alternatives.

Mr. Kraft

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These violations are cited in the enclosed Notice of Violation, and the circumstances surrounding the violations are described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. Your response should include a discussion of your efforts to ensure that TS testing requirements are being addressed by plant procedures, and methods to ensure that reports to the NRC are made in a timely manner. You should also discuss the methods ComEd is taking to ensure that parts approved for installation into safety applications are qualified for their intended use. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room (PDR).

Sincerely,

/s/ J. A. Grobe for

James L. Caldwell, Director  
Division of Reactor Projects

Enclosures:

1. Notice of Violation
2. Inspection Report 50-254/96017(DRP), 50-265/96017(DRP)

Docket Nos.: 50-254, 50-265  
License Nos.: DPR-29, DPR-30

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