



Commonwealth Edison

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August 27, 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 Units 1 and 2
Response to Inspection Report
Nos. 50-254/85-021 and 50-265/85-024
NRC Docket Nos. 50-254 and 50-265

Reference (a): Letter from W.D. Shafer to Cordell Reed
dated July 31, 1985

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. L. J. Hueter on July 9 through 12, 1985, of activities at Quad Cities Station. Reference (a) 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,

M.S. Jurbak
for D. L. Farrar
Director of Nuclear Licensing

Attachment

cc: NRC Resident Inspector - Quad Cities

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COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

As a result of the inspection conducted from July 9 through July 12, 1985, at Quad-Cities Station, the following violation was identified:

Item of Violation

Technical Specification 3.2.G.2 states that...with one or more radioactive liquid effluent monitoring instruments inoperable, take the action shown in Table 3.2-5.

Action A, for service water effluent gross activity monitor, in Table 3.2-5 states that...with less than the minimum number of operable channels, releases via this pathway may continue, provided that at least once per 12 hours grab samples are collected and analyzed for beta or gamma activity at an LLD of less than or equal to 10^{-7} micro curie/ml.

Contrary to the above, the 12 hour grab samples from both Unit 1 and Unit 2 service water, required about 8:00 pm on June 13, 1985, were not collected and analyzed (the service water monitors for both Unit 1 and Unit 2 have remained inoperable since December 19, 1984).

Discussion

Table 3.2-5 of Technical Specifications requires that with less than the minimum number of operable channels, release via the service water pathway may continue, provided that at least once per 12 hour grab samples are collected and analyzed for beta or gamma activity at a Lower Level of Detection (LLD) of less than or equal to 10^{-7} micro curie/ml. The presently installed service water effluent gross activity monitors cannot be demonstrated to meet the Technical Specification requirements that went into effect on December 19, 1984 and therefore, they have been declared inoperable for that purpose. The monitors however, have still been in use. Since December 19, 1984, grab samples have been taken every 12 hours in accordance with Technical Specifications. It was noted that the results of the 0800 hours service water samples on June 13, 1985, for Units 1 and 2 were not recorded. The gross beta activity of the samples for both Units prior to and after the missed samples were less than $9 \text{ E-}9$ micro curie/ml.

After reviewing how the analyses are accomplished, logged and reviewed, it is believed that the samples were obtained and analyzed but the results were not logged. The technicians involved knew of the requirements but most likely failed to do the last step of logging the results. The chemists who review the data became accustomed to reviewing the latest data available in the morning which is the evening sample.

Corrective Action Taken and Results Achieved

The incident was reviewed with technicians and chemists with emphasis on the importance of obtaining, logging and reviewing results for all samples. A computer generated data sheet had been used to assist tracking the interim sampling requirements. It was assumed the 12 hour sampling requirements would be short term and that new service water monitors would be installed shortly. Due to delays in getting the new service water monitors operable, the tracking of the 12 hour interim sampling requirements has now been moved to the Chemistry Daily Technical Specification Surveillance Sheet, QCP 100-S1. Also, the sampling requirement was permanently added to the Counting Room Assignment sheets which are the main method of informing the technician what is required to be accomplished each day.

Corrective Action Taken to Avoid Further Noncompliance

The actions taken to avoid further noncompliance were the movement of the tracking of the 12 hour interim sampling requirements to the Chemistry Daily Technical Specification Surveillance Sheet and the permanent addition of the sampling requirement to the Counting Room Assignment Sheets.

Date when Full Compliance Will Be Achieved

Full compliance is presently achieved. All corrective actions have been completed.