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ComEd

ESK-97-075

April 7, 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 50-254/97003
and 50-265/97003.

Reference: M. Leach to E. S. Kraft, Jr. Letter dated March 7, 1997

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violation (NOV) transmitted with the referenced letter. The report cited a Severity Level IV violation concerning Inadequate Radiological Posting with two examples in accordance with 10 CFR 20.

This letter contains the following commitments:

QCRP 5010-1, "Radiological Posting & Labeling Requirement", will be revised to add clarification on posting and labeling of radioactive material. This action will be completed by 7-15-97.

If there are any questions or comments concerning this letter, please refer them to Mr. Charles Peterson, Regulatory Affairs Manager, at (309) 654-2241, extension 3609.

Respectfully,

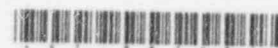
E. S. Kraft, Jr.
E. S. Kraft, Jr.
Site Vice President
Quad Cities Station

Attachment (A), "Response to Notice of Violation"

cc: A. B. Beach, NRC Regional Administrator, RIII
R. M. Pulsifer, NRC Project Manager, NRR
C. G. Miller, Senior Resident Inspector, Quad Cities
D. C. Tubbs, MidAmerican Energy Company
W. D. Leech, MidAmerican Energy Company
F. A. Spangenberg, Regulatory Affairs Manager, Dresden
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**ATTACHMENT A,
"Response to Notice of Violation"
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STATEMENT OF VIOLATION (NRC IR 97-003-01):

NOTICE OF VIOLATION

Technical Specification 6.11 requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

- a) Quad Cities Radiation Protection Procedure (QCRP) 5010-01, "Radiological Posting & Labeling Requirement," Revision 4, dated September 27, 1996, Step G.2.f(1) required that areas having removable (smearable) contamination greater than or equal to 1000 disintegrations per minute (dpm) beta-gamma or 20 dpm alpha utilizing the survey methods established in QCRP 6020-03, "Radiological Surveys," be posted using "CAUTION, CONTAMINATED AREA" signs.
- b) QCRP 5010-01, "Radiological Posting & Labeling Requirement," Revision 4, dated September 27, 1996, Step G.3.b(2) required that "CAUTION-RADIOACTIVE MATERIAL" pre-printed labels/stickers be used to indicate licensed material or containers of licensed material and that these labels indicate dose rates, contamination levels, signature/initials of surveyor, and a description of the material/contents, as practical.

Contrary to the above:

- a) In the Unit 2 "A" Residual Heat Removal (RHR) room, a drainage trough having removable (smearable) contamination greater than or equal to 1000 dpm beta-gamma was not posted with a "CAUTION, CONTAMINATED AREA" sign; and
- b) The labels used for check sources for the service water and the radioactive waste effluent radiation monitors, which contained licensed material, did not clearly indicate dose rates, contamination levels, signature/initials of surveyor, and a description of the material/contents.

This is a Severity Level IV violation (Supplement IV).

**ATTACHMENT A,
"Response to Notice of Violation"
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REASON FOR VIOLATION:

QCRP 5010-01, "Radiological Posting & Labeling Requirement," does not provide adequate guidance for the posting and labeling of radioactive material. The procedure for posting of contaminated areas does not define inaccessible and allows interpretation. This led to the drainage trough in the RHR to be considered inaccessible and not posted as an contaminated area. The term "as practical" for labeling radioactive material was not defined and allowed inconsistent practices. The sources were labeled but did not include all the pertinent information.

ACTIONS TAKEN:

Unit 2 "A" Residual Heat Removal (RHR) room drainage trough was posted as contaminated. The 2B, 1A and the 1B RHR rooms' drainage troughs were also posted as contaminated.

The service water and the radioactive waste effluent radiation monitors' sources were labeled as radioactive material with the pertinent information. A review of other similar monitors with sources was performed and those requiring radioactive material labels, were labeled with the pertinent information.

ACTIONS TO PREVENT FURTHER OCCURRENCE:

QCRP 5010-1, "Radiological Posting & Labeling Requirement", will be revised to add clarification on posting and labeling of radioactive material.
NTS# 2541009700301.01

DATE WHEN FULL COMPLIANCE WILL BE MET:

Unit 2 "A" Residual Heat Removal (RHR) room drainage trough was posted as contaminated and the service water and the radioactive waste effluent radiation monitors' sources were labeled as radioactive material with the pertinent information. Full compliance was met on 3-20-97.