



ESK-97-128

June 19, 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 50-254/97007  
and 50-265/97007

Reference: M. Leech to E. S. Kraft, Jr. Letter dated May 9, 1997

Enclosed is Commonwealth Edison's (ComEd's) responses to the Notices of Violation (NOV) transmitted with the referenced letter. The report cited two Severity Level IV violations. In the first violation, "... the licensee did not use, to the extent practical, process or other engineering controls to control the concentrations of radioactive materials in air while working on a reactor water cleanup system valve." In the second violation, "... the licensee granted items unconditional release that were determined with portable radiation detection instrumentation, to show activity primarily caused by cobalt-60, a beta-gamma emitting radionuclide, ranging from approximately 400 to 500,000 disintegration per minute per square centimeter above background, average over the surface wiped."

This letter contains the following commitments:

1. Procedure QCAP 640-04, "Installation and Use of Containments," is being revised to include the requirement of a pre-job briefing when using containments requiring HEPA ventilation. A statement will also be incorporated in the RWP to ensure that HEPA ventilation on containments is operational. The procedure revision will be completed by July 24, 1997 (NTS 254-100-97-00701.01). The pre-job briefing sheet has been revised to discuss responsibility of workers to ensure the ventilation is functional when using containments.
2. The RP department will train all personnel who perform unconditional release surveys on questions to ask about the previous use of the material, so an adequate risk assessment can be performed. Training will be completed by August 26, 1997 (NTS # 254-100-97-00702.01)

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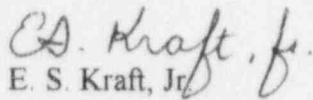


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3. Training request 97-1244 has been written to incorporate questions that need to be asked when performing unconditional release surveys into initial Radiation Protection Technician training. (NTS 254-100-97-00102.02).

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.  
Site Vice President  
Quad Cities Station

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

cc: A. B. Beach, Regional Administrator, Region III  
R. M. Pulsifer, Project Manager, NRR  
C. G. Miller, Senior Resident Inspector, Quad Cities  
W. D. Leech, MidAmerican Energy Company  
D. C. Tubbs, MidAmerican Energy Company  
F. A. Spangenberg, Regulatory Affairs Manager, Dresden  
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## **ATTACHMENT A**

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### **STATEMENT OF VIOLATION (NRC IR 97-007-01):**

#### **NOTICE OF VIOLATION**

10 CFR 20.1701 requires that the licensee use, to the extent practical, process or other engineering controls (e.g., containment or ventilation) to control the concentrations of radioactive material in air.

Contrary to the above:

On April 15, 1997, the licensee did not use, to the extent practical, process or other engineering controls to control the concentrations of radioactive materials in air while working on a reactor water cleanup system valve. Specifically, on one occasion, a ventilation system which was specified and practical for use while work was being performed in a containment device, was not used and on one occasion, decontamination work was performed outside of a containment device which was specified and practical for use during this work.

The failure to use these engineering controls resulted in the failure to control the concentrations of radioactive material in air.

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

#### **REASON FOR VIOLATION:**

The pre-job meeting failed to identify the individual(s) responsible to ensure the ventilation system was operating when work was being performed in the containment. The Radiation Protection Technician who was covering the job allowed work to be performed outside of the containment.

#### **ACTIONS TAKEN:**

All work on valves was stopped and this event was discussed with the valve personnel and Radiation Protection Technicians. All valve RWP's were reviewed to ensure they provided adequate guidance on using ventilation systems. The personnel involved in the event had their access to the Radiological Protective Area suspended. The work on the specific valve was suspended until interim measures were in place to continue work. The RPT providing job coverage was disciplined for allowing decontamination work outside of the containment.

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### **ACTIONS TO PREVENT FURTHER OCCURRENCE:**

Procedure QCAP 640-04, "Installation and Use of Containments," is being revised to include the requirement of a pre-job briefing when using containments requiring HEPA ventilation. A statement will also be incorporated in the RWP to ensure that HEPA ventilation on containments is operational. The procedure revision will be completed by July 24, 1997 (NTS 254-100-97-00701.01). The pre-job briefing sheet has been revised to discuss responsibility of workers to ensure the ventilation is functional when using containments.

### **DATE WHEN FULL COMPLIANCE WILL BE MET:**

Interim corrective actions were implemented on April 23, 1997 and work on the 2-1201-2 valve was restarted.

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### **STATEMENT OF VIOLATION (NRC IR 97-007-02):**

#### **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.

Quad Cities Administrative Procedure No. 600-01 (Revision 0, dated December 4, 1995), "Control of Material for Unconditional Release from Radiologically Posted Areas," Step B.10, requires that items being granted unconditional release shall not show activity above background with portable radiation detection instrumentation.

Contrary to the above:

In September 1996, the licensee, granted items unconditional release that were determined with portable radiation detection instrumentation, to show activity primarily caused by cobalt-60, a beta-gamma emitting radionuclide, ranging from approximately 400 to 500,000 disintegration per minute per square centimeter above background, average over the surface wiped.

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

#### **REASON FOR VIOLATION:**

The Radiation Protection Department did not perform an adequate risk assessment and survey for the unconditional release of the Rail Car.

#### **ACTIONS TAKEN:**

All railroad cars sent off-site were re-surveyed for contamination. Material found contaminated was brought back to the Station. The Radiation Protection Technician involved with the event was disciplined.

QCAP 0600-01 "Control of Materials for Unconditional Release from Radiologically Posted Areas" allows the unconditional release of material. This procedure gives guidance on the release of many different types of material. This guidance was reviewed and found adequate for the unconditional release of material.

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Material being unconditionally released (with a GM instrument) not listed in QCAP 0600-01, that has been decontaminated, requires RP Supervision to give direct guidance to the personnel releasing the material on survey requirements. This is an interim measure to remain in place until all personnel are trained as described below.

### **ACTIONS TO PREVENT FURTHER OCCURRENCE:**

The Radiation Protection Department will train all personnel who perform unconditional release surveys on questions to ask about the material, so an adequate risk assessment can be performed. Training will be completed by August 26, 1997 (NTS 254-100-97-00102.01).

Training request 97-1244 has been written to incorporate questions that need to be asked when performing unconditional release surveys into initial Radiation Protection Technician training. (NTS 254-100-97-00102.02).

### **DATE WHEN FULL COMPLIANCE WILL BE MET:**

Training of personnel who perform unconditional release surveys will be completed by August 26, 1997.