

October 24, 1997

EA-466

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

SUBJECT: NRC INSPECTION REPORTS 50-254/97017(DRS); 50-265/97017(DRS)

Dear Mr. Pearce:

On September 12, 1997, the NRC completed an inspection at your Quad Cities Nuclear Power Station. The purpose of the inspection was to review your implementation of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" (the maintenance rule). The results of that inspection are presented in the enclosed report.

Your program for implementing the requirements of the maintenance rule was based on the guidance provided in NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," dated April 1996, which was endorsed by the NRC in Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," dated March 1997.

As a result of the inspection, we concluded that your maintenance rule program was not adequately implemented. This conclusion was based on a determination that adequate monitoring of systems and components was not being accomplished as the result of inadequacies in establishing goals and monitoring, establishing system and function performance criteria, evaluating maintenance preventable functional failures, and performing historical reviews of operating data for systems and functions.

Based on the results of this inspection, four apparent violations were identified and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. The apparent violations concern your failure to implement an adequate maintenance rule program. Accordingly, no Notice of Violation is presently being issued for these inspection findings. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

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A predecisional enforcement conference to discuss these apparent violations will be scheduled. The decision to hold a predecisional 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 to enable the NRC to make an enforcement decision, such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violations sooner, corrective actions, significance of the issues and the need for lasting and effective corrective action. In particular, due to the fact that your maintenance rule program did not appear to be corporate-driven and implemented, we expect you to also be able to address the effect of these deficiencies with regard to implementation of this program at your other facilities. Additionally, this is an opportunity for you to point out any errors in our inspection report and for you to provide any 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.

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 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).

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

original signed by J. A. Grobe

John A. Grobe, Director
Division of Reactor Safety

Docket Nos. 50-254; 50-265
License Nos. DPR-29; DPR-30

Enclosure: Inspection Reports 50-254/97017(DRS); 50-265/97017(DRS)

See Attached Distribution

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