



Commonwealth Edison
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May 26, 1981

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2
Response to IE Inspection Report
Nos. 50-237/81-06, 50-249/81-04,
50-254/81-03, 50-265/81-03, 50-295/81-05
and 50-304/81-03
NRC Docket Nos. 50-237/249/254/265/295/304

Reference (a): C. E. Norelius letter to C. Reed dated
May 1, 1981

Dear Mr. Keppler:

Reference (a) transmitted the results of an inspection conducted by Messrs. K. R. Bahn, R. O. Schultz, M. L. Gildner, M. M. Holzmer, J. M. Reschel, and J. A. Grobe on February 23-27 and March 9-13, 1981, of activities at Quad Cities Station Units 1 and 2. Also transmitted were the results of subsequent discussions concerning implementation of ANSI 18.7-1976 at Zion Station with K. L. Graesser on March 17, 1981 and at Dresden Station with R. M. Ragan on March 18, 1981.

Appendix A to Reference (a) identified four apparent items of noncompliance with NRC requirements.

The attachment to this letter contains our response to noncompliance items 2, 3, and 4 of Appendix A to Reference (a), which apply only to Quad Cities Units 1 and 2. Our response to noncompliance item 1 which applies to Dresden Units 2 and 3, Quad Cities Units 1 and 2, and Zion Units 1 and 2 is as follows:

1. 10 CFR 50, Appendix B, Criteria II, states in part, "The applicant shall establish at the earliest practical time, consistent with the schedule for accomplishing the activities, a quality assurance program which complies with the requirements of this appendix. This program shall be documented by written

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policies, procedures, or instruction and shall be carried out though plant life in accordance with these policies, procedures, or instructions."

Commonwealth Edison Company quality assurance commits to implementing ANSI N18.7-1976 for all their nuclear power plants through Regulatory Guide 1.33 Revision 2, as stated in the Quality Assurance Program Topical Report, CE-1-1A, Revision 14 and 15.

Contrary to the above, Quad-Cities, Zion, and Dresden Nuclear Power Generating Stations are not implementing portions of ANSI N18.7-1976. (examples deleted here)

Response

The Quality Assurance Program Topical Report is a generic document that applies in general to all Commonwealth Edison Company nuclear stations, either operating or under construction. The original document was submitted when CECO. had three nuclear stations and committed to standards and regulatory guides appropriate to this vintage of plants such as ANSI/ANS 18.1-1971 and ANSI/ANS 18.7-1972.

The Quality Assurance Program Topical Report approved and issued for the nuclear plants describes the specific commitments to standards and regulatory guides and as described in Section 2 of the Topical Report requires exemptions to Regulatory Guides and Standards to be set forth in the respective Station SAR and Technical Specifications.

The Technical Specifications at Dresden, Quad Cities, and Zion indicate that each plant is committed to ANSI/ANS 18.1 - 1971 since this standard was developed for use by this vintage of nuclear power plants. The Zion SAR specifically commits to Safety Guide 33 (November 3, 1972), "Quality Assurance Program Requirements (Operation)". This safety guide references as acceptable the compliance with proposed standard ANS 3.2 (November 2, 1972) which became ANSI/ANS 18.7-1972. We therefore believe that Zion Station, by reference to Safety Guide 33 in the SAR, has a specific commitment to ANSI/ANS 18.7-1972 rather than ANSI 18.7-1976 as specified in the Quality Assurance Topical Report.

The Dresden and Quad Cities SAR's and Technical Specifications do not, however, reference a commitment to any ANSI/ANS 18.7 standard since the original 1972 standard had not been issued at the time these plants were licensed. When the ANSI/ANS 18.7 - 1972 standard was issued, these stations voluntarily committed to this standard since it was developed for plants going into service in the early 1970's as part of the overall

implementation of Quality Assurance at all nuclear stations in the United States, and the Management of CECO. actively participated in the development of this standard.

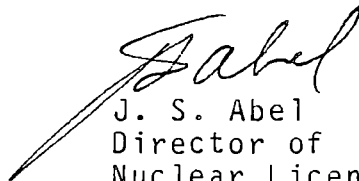
The Quality Assurance Program Topical Report, on the other hand, has been and is being periodically revised to keep it up-to-date with current requirements in order to satisfy regulatory requirements in connection with licensing our other plants presently under construction (LaSalle, Byron and Braidwood) and indicates the commitments related to these plants. There was never any intent to generally back-fit new standards and Regulatory Guides to the existing operating stations (Dresden, Quad Cities, and Zion) but rather to specifically commit where required by the NRC; and these stations have been managed and operated accordingly since 1972.

Based on the preceding discussion, it is our belief that noncompliance with the strict interpretation of the Quality Assurance Topical Report may have occurred at Dresden, Quad Cities, and Zion due to failure to specifically identify the commitments to appropriate standards. However, we also believe that we were and are in full compliance with the requirements which we understand to be in effect for these stations.

In order to prevent a future occurrence, Technical Specification changes will be submitted for Dresden, Quad Cities, and Zion which will identify the appropriate standards relating to quality assurance to which the stations are committed to comply. We believe these changes can be prepared and submitted within thirty days from the date of this letter. Full compliance will be achieved following review and approval of these changes by the NRC.

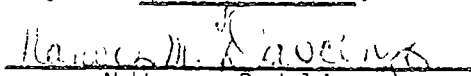
Please address any questions concerning this matter to this office.

Very truly yours,


J. S. Abel
Director of
Nuclear Licensing

cc: RIII Inspector, Dresden
RIII Inspector, Quad Cities
RIII Inspector, Zion

SUBSCRIBED and SWORN to
before me this 26th
day of May, 1981


Notary Public

2052N

Commonwealth Edison Company

Attachment

Response to Notice of Violation

NRC Docket Numbers
50-254 and 50-265

Items of Non-Compliance identified in Appendix A to the NRC letter dated May 1, 1981, are responded to in the following paragraphs.

2. Contrary to 10 CFR 50, Appendix B, Criteria IV and VII, the following examples of non-compliance were identified:
 - a. Orders placed with Instrument Associates for instrument tube fittings and valves, did not specify the applicable grade/type of stainless steel necessary to assure adequate quality as required by Sargent and Lundy design specifications. Purchase Order number 226863 and the numerous releases on Blanket Purchase Order number 501345 are examples of this grade/type omission.
 - b. Valves were received and accepted on Purchase Order numbers 226863, 501345 Release number 67, and 501345 Release number 88 without documentation that the valves conformed to the procurement document requirements.
 - c. The valves received on Purchase Order number 226863 were installed in a safety related, ATWS modification, without documentary evidence that the material conformed to the procurement requirements.

Corrective Action Taken and Results Achieved

As stated in the inspection report, paragraphs 6c and 6d, the Station has committed to implementing the right of access statements on procurement documents. Procedures QAP 600-1 and QAP 600-T4 have been revised to require these statements on all safety related and ASME Code-related procurement documents. Further, the Station has received certification verifying the type or grade of material furnished by Instrument Associates.

Corrective Action to be Taken to Avoid Further Non-Compliance

Station Quality Control personnel are instructed to review the procurement requirements on Instrument Associates "Request for Purchase" for inclusion of "Material Type", as well as the ASME Code Specification. All Station "min-max" cards to Instrument Associates will be changed to include the above requirements.

Date When Full Compliance will be Achieved

Full compliance will be achieved when all "min-max" cards to Instrument Associates are changed as stated above. This should be completed by June 1, 1981.

3. Contrary to Technical Specification 3.7.B.1 and 6.6.B.1.b, QOS 7500-S4 documents performance of a monthly operability test of the A train of the Standby Gas Treatment System on August 8, 1980, for which the system flow was recorded as 3480 cfm. No Deviation Report could be found for review and no apparent notification or written follow-up was provided to the NRC.

Corrective Action Taken and Results Achieved

The Operations Weekly Summary of Daily Surveillance, QOS 005-S1, showed that the A Standby Gas Treatment System did meet the flow requirements of Technical Specification 3.7.B.1 on August 8, 1980, as well as on each occasion that it was run before and after August 8, 1980. The Station believes that the reading on QOS 7500-S4 was recorded incorrectly and that the A Standby Gas Treatment System was fully operable. The method for verifying surveillances has been reviewed. This case seems to be an isolated incident that was missed in the review of the many surveillances that are conducted. The surveillance review is considered adequate, and has always been given prompt attention. The Station has written Deviation Reports on equipment that has not performed in accordance with Technical Specifications, and will continue to do so.

Corrective Action to be Taken to Avoid Further Non-Compliance

In order to catch recording errors, QOS 7500-5, Standby Gas Treatment System Monthly Operability Test, and QOS 7500-S4, Standby Gas Treatment System Monthly Operability data sheet will be revised. In all places where these procedures say "4000 cfm (+ 10%)" they will be changed to read "3600 cfm to 4400 cfm (4000 cfm \pm 10%)."

Complete and proper review of surveillances has been stressed.

Date When Full Compliance will be Achieved

Full compliance is achieved at this time. QOS 7500-5 and QOS 7500-S4 will be revised by July 1, 1981.

4. 10 CFR 50, Appendix B, Criterion III, Design Control states in part that design changes shall be subject to design control measures commensurate with those applied to the original design and be approved by the organization that performed the original design.

Commonwealth Edison Company states in part in their Quality Assurance Program Topical Report, CE-1-A, Revision 14 and 15, Section 3 - Design Control, "Design evaluations of modifications will be commensurate with those applied to the original design."

10 CFR 50.59 states in part that the licensee shall maintain records of changes in the facility and . . . these records shall include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, a nitrogen purge system to the SRM and IRM detector connectors was installed in Quad-Cities Unit 2 by means of only Maintenance Work Request number Q03507. This bypassed the established system for processing a plant design change or modification. Furthermore, a documented Safety Review could not be provided for this modification.

Corrective Action Taken and Results Achieved

A safety evaluation per 10 CFR 50.59 has been performed on the installation of the nitrogen purge system to the SRM and IRM detector connectors, and has concluded that no unreviewed safety question exists. A special test has been written to follow this project and the safety evaluation is part of the supporting documentation.

Corrective Action to be Taken to Avoid Further Non-Compliance

Upon completion of the special test, the nitrogen purge system will either be removed or will be documented as a permanent installation by means of the modification procedure. Also, a more diligent effort will be made during the technical review of work requests to identify those items which are changes to the plant design and require a safety evaluation.

Date When Full Compliance will be Achieved

Full compliance is achieved at this time.