

October 6, 1975



Dr. Donald Knuth, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Response to Non-Compliance Item and Civil Penalty  
for Quad Cities Units 1 and 2. Operating License  
Numbers DPR-29 and DPR-30. NRC Docket Numbers  
50-254 and 50-265.

Dear Dr. Knuth:

Our response to Appendices A & B of your letter of August 28, 1975, is attached. Specific response to the violations are numbered to correspond with the violations listed in your letter. The reply to Appendix A contains material related to the details of an industrial security plan and should be withheld from public disclosure in accordance with 10 CFR 2.296.

Your letter asked that in addition to the replies to the specific violations, we inform you of the steps which management was taking to improve compliance in the two major areas in which violations were found. In the area of industrial security, Commonwealth Edison has employed a consultant since the Spring 1975, and we are in the process of implementing a number of recommendations he has made to improve our security plans. Specifically, we are in the process of employing a full time security officer for nuclear generating stations. We believe that the addition of this individual will give our security program the attention which it must have to be continually effective.

Although we have elected not to request reduction or remission of any part of the civil penalty which was imposed, we would like to call your attention to Item 4 of Appendix A. It is our belief that this infraction resulted from a conscientious action taken to temporarily remedy a deficiency in the permanent security system and is indicative not of a lack of concern about security matters, but rather of a determination to meet all the criteria of 10 CFR 73 as quickly as possible.

With respect to the violations cited in Appendix B, Commonwealth has taken a number of actions. At a meeting held on June 4, 1975, between Region III and Edison personnel, a number of commitments to improved management control were made, and are being implemented. These commitments were further emphasized at a meeting held on June 24, 1975, between Messrs. Ayers and Behnke of Commonwealth, and Keppler and Fiorelli of Region III.

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Since that time, Mr. Ayers and other members of Commonwealth's top management have visited each of our nuclear stations to review the importance of compliance with NRC regulations with station personnel. We have initiated a program to improve the analysis and trending of Abnormal Occurrences and equipment failures. We also have reviewed our Action Item Lists to concentrate our efforts on the most significant items. Finally, we have instituted a program which gives personnel errors in our stations the same degree of investigation and analysis which is given to serious accidents.

Commonwealth Edison intends to take every action necessary to insure that Quad Cities Station is operated in conformance with all NRC regulations and continues to pose no hazard to public health and safety.

Sincerely,

*R. F. Bolger*  
for Byron Lee Jr.  
Vice President

mjt

Attach.

cc: T. G. Ayers  
W. B. Behnke  
J. G. Keppler

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APPENDIX B

REFERENCE: August 28, 1975 NRC Letter Appendix "B"

DISCUSSION OF INFRACTION, ITEM 1a:

Power Operations Procedure OGP 3-1, Revision 1, sets the limits for the linear heat generation rate based on General Electric recommendations to avoid fuel failure. On May 21 and 22, 1975, the maximum allowable heat generation rate per these guidelines was exceeded as a result of inadequately prescribed control rod movements combined with flow increases and a xenon transient. However, the technical specification limit was not exceeded.

This event was primarily caused by inadequate communications among the parties involved and insufficient response to alarms. Following a reactor startup on May 20, 1975, the Nuclear Engineer had left instructions for shift personnel to inform him when 700 MWe was reached so that core conditions could be evaluated in order to determine the course to increased power levels. The judgment error here was that a local power level rather than a gross power level should have been specified. By the time the specified gross power level was reached, the expected local power had been passed due to improper consideration of the xenon transient actually experienced during startup.

CORRECTIVE ACTION:

The subject procedure has been revised such that it provides for the Nuclear Engineers to supply the shift personnel with a set of maximum allowable LPRM readings. Action levels are established based on comparison of the actual LPRM reading to the maximum LPRM readings.

Meetings and discussions have also been held with the groups involved, emphasizing the circumstances related to this event, and reiterating their responsibilities while performing their respective jobs.

DATE OF FULL COMPLIANCE:

Full compliance with this infraction was achieved on September 3, 1975, with the issuance of Revision 2 to the subject procedure.

DISCUSSION OF INFRACTION, ITEM 1b:

At the time of this event, a station procedure that formally provided for the preparation and approval of control rod sequences for each startup had not been implemented.

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CORRECTIVE ACTION:

Station Procedure OTP 1600-4, Revision 1, has been issued which provides guidelines and direction for the Nuclear Engineers in the preparation and approval of control rod sequences.

DATE OF FULL COMPLIANCE:

Full compliance with this infraction was achieved on June 17, 1975, with the issuance of the above procedure.

DISCUSSION OF INFRACTION, ITEM 2:

Contrary to Station Administrative Procedure 39-3-4, instructions given to the operating staff regarding other than normal operations on the second shift on May 21, 1975, were not formally documented in the Daily Order Book, and the Operating Engineer was offsite.

CORRECTIVE ACTION:

The normal practice of the Operating Engineers is to write information in the Daily Order Book regarding the rates of power increase and decrease and precautions to be taken for startups and maneuvers. Such practice will be followed more closely in the future.

Modifications to the control rod withdrawal sequence will be made as part of the normal activities of qualified Nuclear Engineers to minimize potential for pellet-clad interaction and to optimize fuel utilization during planned maneuvers including startups. Notification of planned maneuvers, however, will be written in the Daily Orders by the Operating Engineer.

The procedure referenced in Item 1b above provides formal guidelines for qualified Nuclear Engineers in performing control rod sequence modifications and should complete the procedural deficiency fulfillment.

DATE OF FULL COMPLIANCE:

As described above, full compliance is achieved with this infraction at the present time.

Actions taken or planned at the station to improve the effectiveness of management control as it relates to these items of noncompliance have been in the form of increased participation by the Nuclear Engineers in rod maneuvering in order to maintain the core conditions within the established limits. Additionally, during the regular training periods for the licensed operators, emphasis will be placed on the importance of understanding and following the procedural controls established to provide for satisfactory performance of the reactor core and still maintain its integrity. These actions along with the specific actions described above should improve personnel performance and serve to prevent occurrences similar to this in the future and thus enhance the management control related to these items of noncompliance.

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