



**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

January 16, 1979

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

Subject: Quad-Cities Station Unit 2  
Response to IE Inspection Report  
No. 50-265/78-30  
NRC Docket No. 50-265


Reference (a): Gaston Fiorelli letter to Byron Lee, Jr.  
dated December 26, 1978

Dear Mr. Keppler:

Reference (a) transmitted an inspection report regarding an inspection conducted by Messrs. E. Chow and J. S. Creswell of your office on November 15-17, 1978 of activities at Quad-Cities Nuclear Power Station Unit 2. Reference (a) indicated that certain of our activities appeared to be in noncompliance with NRC requirements. The item of noncompliance is addressed in the attachment to this letter.

Please address any additional questions that you might have to this office.

Very truly yours,

  
Cordell Reed  
Assistant Vice-President

attachment

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ATTACHMENT

INFRACTION

Technical Specification 6.2.A.7 requires the licensee to follow surveillance and testing procedures. Surveillance procedure QTS 1311-4 requires a Local Power Range Monitor (LPRM) to be bypassed when the bypassing criterion is exceeded.

Contrary to the above, LPRM 40-17-C was not bypassed on March 13, 1978 when the bypassing criterion was exceeded.

DISCUSSION

The Inspection Summary identified two LPRMs that, in the inspector's opinion, should have been bypassed per procedure QTS 1311-4, which specifies a criteria for bypassing Local Power Range Monitors (LPRM). These were LPRM 40-17 C on April 18, 1978 and LPRM 40-17 A on March 13, 1978.

The station agrees that LPRM 40-17 C was detected as being high on April 18, 1978 and should have been bypassed on that date (the March 13 date stated in the notice of violation appears to be a transcription error).

Procedure QTS 1311-4 allows an engineer to use judgment in deciding if an LPRM must be bypassed in certain conservative cases, and thus bypassing LPRM 40-17 A on March 13, 1978 was not required. On March 13, 1978, the unit was being started up after a refueling outage, and it is normal to find LPRMs out of calibration before they are calibrated above 50% power.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

A review of the procedures for the calibration and bypassing of LPRMs (QTS 1311-1 and 4) was conducted. In addition, a review was made of the number of LPRMs that are being bypassed and the reasons for their being bypassed. Over the last 15 months the station's normal surveillance procedures have resulted in over 60 LPRMs being bypassed for high readings, 30 LPRMs being bypassed for low or downscale readings, and more than 30 others for various hardware problems. It is felt that these procedures are adequate and not in need of change.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

This item of noncompliance and the need for maintaining close control of the LPRM calibration was discussed with the personnel responsible for LPRM surveillance.

In addition, LPRMs of a new design, which should be less subject to failure, have been purchased and will start to be installed on the next refueling outage of each unit.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance is achieved at this time.