

NOTICE OF VIOLATION

Commonwealth Edison Company
Quad Cities Station, Units 1 and 2

Docket No. 50-254
Docket No. 50-265

As a result of the inspection conducted on September 18-22, October 2-6, and 18, 1989, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1988), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, as described in Section 5, of Topical Report CE-1A, Revision 55, and as implemented by Quality Assurance Manual, Section 5, requires that activities affecting quality be prescribed by documented instructions, procedures, and drawings, and that those activities be accomplished in accordance with those instructions, procedures and drawings. Criterion V further requires that Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above:

- a. The licensee failed to follow the acceptance criteria of Quad Cities Nuclear Station Work Procedure NSWP-E-01, "Electrical Cable Installation and Inspection," Revision 1, for calculating the maximum allowable pull tension of electrical cables. This procedure, based on the vendor cable pulling criteria, stated that the maximum pulls shall not exceed either the maximum pull tension or a tension to be calculated on the basis of the sidewall pressure factor and the radius of the conduit bend. This resulted in a contractor specifying higher than allowable pull tensions in two work packages.

Work package Q 69856 specified a maximum cable pull of 3165 lbs. instead of 467 lbs.; and work package Q 69854 specified a maximum cable pull of 7000 lbs. instead of 1558 lbs. This did not result in any cable pulls in excess of the revised allowable cable pulls in these two cases. The vendor's formula for calculating maximum allowable cable pulls was not utilized for most of the licensee's cable pulls made during plant outages in 1987 and 1988. The licensee was asked to investigate these cable pulls to verify acceptability of pull tension and to take corrective actions as necessary. (254/89017-01A; 265/89017-01A)

- b. Quad Cities Procedure QMMS 6600-1-S4, "Diesel Inspection - Refueling Outage Checklist," Revision 2, did not include the acceptance criteria for the diesel overspeed trip test. The checklist, which was used for the tests on Unit 1/2 (common) on May 7, 1988, and on Unit 2 on June 9, 1988, had no provision to document the as-found overspeed trip setting of the diesels. As a result, the as-found trip settings on some previous tests could not be verified. (254/89017-01B; 265/89017-01B).

- c. Quad Cities procedure QOS 2300-7, "HPCI Turbine Overspeed Test," Revision 3, did not include an acceptance criteria for the overspeed trip test. As the overspeed trip test results could not be verified for several years of operation prior to 1986, it was not evident whether the test results were within the acceptable limits. (254/89017-01C; 265/89017-01C).
- d. Quad Cities Procedure QOS 2300-7, "HPCI Turbine Overspeed Test," Revision 3, had no provision to document either the as-found overspeed trip setting of the HPCI turbine or dates and signatures by the QC/QA inspector and test engineer. As-found trip settings could not be traced for tests conducted prior to 1986 and the results of tests conducted between 1987 and 1989 could only be obtained from the operator logs. (254/89017-01D; 265/89017-01D)

This is a Severity Level IV Violation (Supplement 1).

- 2. 10 CFR 50, Appendix B, Criterion XVI, as described in Topical Report CE-1A, Revision 55, and as implemented by Quality Assurance Manual, Section 16, requires that measures be established to assure conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective actions taken to preclude repetition, and that the significant conditions adverse to quality, the causes of the condition, and the corrective actions taken are documented and reported to appropriate levels of management.

Contrary to the above:

- a. The licensee failed to document and evaluate non-conforming conditions regarding the installation of oversized fuses during and prior to this inspection, in spite of having resolved an Action Item Request on this subject in 1988 committing to document and evaluate fuse size discrepancies when identified. Thus, the causes of the nonconforming conditions were not identified and corrective action to preclude recurrence was not implemented. (254/89017-02A; 265/89017-02A)
- b. The licensee failed to take adequate corrective action to implement vendor recommended preventive maintenance to inspect, lubricate, and exercise the RCIC turbine trip valve and linkage even after the subject turbine tripped several times on overspeed in 1986 due to the linkage being out of adjustment. (254/89017-02B; 265/89017-02B)

This is a Severity Level IV violation (Supplement 1).

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Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

11/28/89
Dated

T.O. Martin for
H. J. Miller, Director
Division of Reactor Safety