

JUN 1 1981

Sheet - Unit 1 Equipment Attendant," and QOS 005-S14, "Operator Surveillance Turnover Sheet - Unit 2 Equipment Attendant," will be revised to include inspection of all equipment and personnel hatches into the Unit 1 and 2 Cable Tunnels from the Auxiliary Electric Equipment Room and the Turbine Building 595' Level once each shift. This will provide verification that these hatches remain closed. The equipment hatch in the cable riser area from the Unit 2 Cable Tunnel (Turbine Building 595' Level, area F-G/12-13) has been locked closed.

These actions and those delineated in your letter are acceptable to mitigate the occurrence of the hatches being left open. However, they do not adequately demonstrate that your safe shutdown analysis, as documented in your letters to the NRC dated July 31, 1978, October 1, 1979 and January 23, February 29, and March 4, 1980, is not compromised by the unrated hatches between the Cable Tunnels and the Turbine Building 595' Level. Therefore, you agreed to provide an additional response addressing this concern. Specifically, 10 CFR 50, Appendix R, Section III.G., is to be utilized as the criteria for determining which equipment and cabling necessary for safe shutdown could be affected by a fire that spreads from a Cable Tunnel to the Turbine Building 595' Level through the unrated personnel and equipment hatches.

We will examine these matters during a subsequent inspection.

With respect to your response regarding Unresolved Item No. 3 in Attachment B to your letter, our position on these issues has not changed and they are being evaluated by IE Headquarters. No action by you is presently required on these items.

Your cooperation with us is appreciated.

Sincerely,

"Original Signed by C.E. Norelius"

C. E. Norelius, Acting Director
Division of Engineering and
Technical Inspection

cc: J. S. Abel, Director
of Nuclear Licensing
N. Kalivianakis,
Plant Superintendent

cc w/ltr dtd 4/28/81:
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Resident Inspector, RIII
Mary Jo Murray, Office of
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Commonwealth Edison

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April 28, 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: Quad Cities Station Units 1 and 2
Response to IF Inspection Report
Nos. 50-254/81-04 and 50-265/81-04
NRC Docket Nos. 50-254/265

Reference (a): C. E. Norelius letter to C. Reed dated
April 3, 1981

Dear Mr. Keppler:

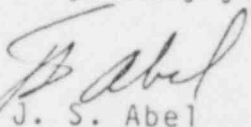
Reference (a) transmitted the results of an inspection conducted by Messrs J. A. Grobe and K. R. Baker of your office on February 23-27, 1981, of activities at Quad Cities Units 1 and 2. Appendix A to that report identified four apparent items of noncompliance with NRC requirements.

Our responses to the items of noncompliance are provided in Attachment A to this letter. Our response to two additional concerns identified in Reference (a) are provided in Attachment B. We have also taken this opportunity to provide our responses to two unresolved items identified in Reference (a), which also appear in Attachment B.

As indicated in Attachment A, full compliance has already been achieved for all items of noncompliance except Item 1, which will be complete by July 1, 1981.

Please address any questions concerning this matter to this office.

Very truly yours,


J. S. Abel
Director of
Nuclear Licensing

cc: RIII Inspector, Quad Cities
Attachment
2598B

APR 30 1981

ATTACHMENT A

Commonwealth Edison
Attachment
Response to Notice of Violation

Items of noncompliance identified in Appendix A to the NRC letter dated April 3, 1981, are responded to in the following paragraphs:

1. Contrary to QMP 100-3, Fire Prevention for Welding and Cutting, the inspector observed a contractor welder on February 26, 1981 in the Unit 2 Cable Tunnel performing welding operations above safety related cabling without a fire watch in the immediate area. Trays of safety related cabling were not covered with suitable noncombustible materials and were being exposed to potential damage or ignition and combustible materials (wood, cardboard, paper, and plastic) had accumulated in the immediate area of the welding operations. Unit 2 was operating at 100% at the time of this observation.

Corrective Action and Results Achieved

When the Station was made aware of the welding operations in the Unit 2 Cable Tunnel, the work was stopped. The contractor firm involved was informed of the Station procedures that are required to be followed for welding in safety-related areas. The Unit 2 Cable Tunnel was cleaned and the proper administrative controls taken before work was allowed to resume. In addition, all cables in the Unit 2 Cable Tunnel were inspected for damage that could have resulted from exposure to ignition sources. The results of this inspection showed no damage.

Corrective Action Taken to Avoid Further Noncompliance

Maintenance Procedure QMP 100-3, Fire Prevention for Welding and Cutting, has been reviewed and is deemed adequate for use in preventing fires. However, QMP 100-S1, Working and Cutting Permit, which is used to implement QMP 100-3 is being revised. The revision will consist of additional approval sign-offs which include: 1) Fire Watch Present During Work; 2) Fire Extinguisher at Job Location, and in Working Order; 3) Area Cleaned and Inspected Before Starting Work; 4) Equipment Protected Before Starting Work; 5) Operating Engineer's authorization before welding in the Auxiliary Electrical Equipment Room, Control Room and Cable Spreading Room. Additional information for Area Preparation,

Environmental Preparations, and Fire Prevention Inspection has also been taken from QMP 100-3 and will be included in the Welding and Cutting Permit revision.

Date When Full Compliance Will be Achieved

QMP 100-S1, Welding and Cutting Permit, will be revised by July 1, 1981. The Contractors and Station personnel have been instructed, and are following procedure QMP 100-3 at this time.

2. Contrary to Technical Specification 3.12.F.1 and 3.12.F.2 the inspector observed an open fire barrier penetration above the fire door between the Unit 1 and Unit 2 Reactor Buildings on the 595' level with no apparent fire watch.

Corrective Action and Results Achieved

Upon discovery of the four inch penetration which had been core-bored in the wall between Unit 1 and Unit 2 Reactor Building a fire watch was established in accordance with Technical Specification 3.12.F.2. The penetration was sealed and the fire watch terminated on the same day.

Corrective Action Taken to Avoid Further Noncompliance

Subsequent meetings with Contractors and Commonwealth Edison Company personnel resulted in a review of the requirements of Technical Specifications 3.12.F.1 and 3.12.F.2, and Station Procedures. A policy was established which requires notification of cognizant Station management whenever a fire penetration barrier must be opened. This will allow management to verify that compliance to Technical Specifications is maintained.

Date When Full Compliance Will be Achieved

Full compliance is achieved as of this date.

3. Contrary to QAP 200-13, Station Housekeeping Organization, the inspector observed accumulations of combustible material in safety related areas including the Auxiliary Electric Equipment Room, the Cable Tunnels and the 1/2 Diesel Generator Room which were indicative of failure to adhere to the above procedure.

Corrective Action Taken and Results Achieved

The accumulation of combustibles in the Auxiliary Electrical Equipment Room, the Cable Tunnels, and the 1/2 Diesel Generator Room have been removed. In addition, the other safety-related areas mentioned in the Inspection Report have been cleaned.

Corrective Action Taken to Avoid Further Noncompliance

A clean up crew consisting of approximately nine people from various Station departments has been assigned to clean the plant. This crew will have no other responsibilities until such time that the cleanliness of the plant is satisfactory. Assistance in accomplishing the necessary inspections to assure that the plant remains in a state of adequate cleanliness has been assigned by the Assistant Superintendent of Maintenance.

Date When Full Compliance Will be Achieved

Full compliance is achieved as of this date.

4. Contrary to QRP 100-1, Radiation Control Standards which states, "Do not eat, smoke, drink, or chew in controlled areas", the inspector observed many cigarette butts scattered throughout the Unit 1 and Unit 2 Cable Tunnels and an empty beer can in the Unit 1 Cable Tunnel.

Corrective Action Taken and Results Achieved

A review of the posting of the Cable Tunnels has been done and have been found to be adequately posted as controlled areas. Enforcement of the Radiation Control Standards is an on-going and continuous effort. The time and date when this violation occurred is not known. Thus, personnel were not seen drinking and smoking in the Cable Tunnels. If personnel are observed not conforming to any established Radiation Control Standard, appropriate action is taken.

Corrective Action to be Taken to Avoid Further Noncompliance

The Station will continue the policy of training and instruction for all personnel in the Radiation Control Standards. Observed non-conformances of the Standards will be dealt with promptly.

Date When Full Compliance Will be Achieved

Full compliance is achieved as of this date.

ATTACHMENT B

Commonwealth Edison
Attachment
Response to Additional Concerns
Response to Unresolved Items

Items of additional concern identified in the NRC letter dated April 3, 1981 and unresolved items in the Inspection Report are responded to in the following paragraphs:

1. The inspector observed open hatches in the three hour rated fire barrier separating the Cable Tunnels from the Auxiliary Electric Equipment Room and the Turbine Building 595' level. There is a possibility that these open fire barrier penetrations could create degraded safe shutdown capability if a fire occurred in an adjacent zone.

On January 29, 1981, the Station contacted the NRC for a resolution on all the hatches that enter the Cable Tunnels.

After this resolution was obtained on January 29, 1981, signs were ordered to control access through the Cable Tunnel hatches. The signs were received on March 3, 1981, and installed the same week. Since that time, the hatches have remained closed when the Cable Tunnels are unoccupied. The hatches entering the Cable Tunnels from the Auxiliary Electrical Equipment Room were coated with fire retardant in the Fall of 1980 to upgrade their fire rating to three hours in accordance with Section 5.3.6 of the Fire Protection Safety Evaluation Report.

2. The inspector identified fire hoses in the Radwaste Building, Off-Gas Filter Building, Resin Solidification Building, and Maximum Recycle area that have not been hydrostatically tested in five to twelve years. There is no equipment located in these areas which is required for safe shutdown of the plant, but an uncontrolled fire in these areas could result in the release of airborne radioactive materials. Please provide any comments or plans you have to upgrade the fire protection of these areas considering the questionable pressure boundary integrity of these hoses.

The fire hoses identified by the inspector have been upgraded with hoses that have been hydrostatically tested. These hose stations were added to the three year surveillance schedule in 1978 and were scheduled for testing in 1981. It is our firm belief that these hoses had been tested in 1978, but records are not available to confirm this.

3. Unresolved Items (50-254/81-04-04; 50-265/81-04-04) fire fighting strategies and procedures, and (50-254/81-04-08; 50-265/81-04-08) fire brigade drills.

The inspection report stated that fire fighting strategies and procedures, and fire drills do not meet the guidelines of "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance".

The basis for our position involves formal submittals and meetings with the NRC which extended for a period of almost two years.

The first submittal dated April 27, 1978, specifically addresses fire fighting strategies and procedures, and fire drills in response to the Staff guidelines "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance". The second submittal dated July 27, 1978, also addresses fire fighting strategies and procedures.