

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-254/82-07(DETP); 50-265/82-08(DETP)

Docket Nos. 50-254; 50-265

Licenses No. DPR-29, DPR-30

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: Quad-Cities Nuclear Power Station, Units 1 and 2

Inspection At: Cordova, IL

Inspection Conducted: March 11, 1982

Inspector: M. M. Holzner
M. M. Holzner

4/9/82
Date

Approved By: W. D. Shafer
W. D. Shafer, Chief
Management Programs Section

4/9/82
Date

Inspection Summary

Inspection on March 11, 1982 (Reports No. 50-254/82-07(DETP); 50-265/82-08(DETP))

Areas Inspected: Licensee action on previous inspection findings, unresolved items and noncompliances. The inspection involved a total of six inspector-hours onsite by one NRC inspector.

Results: Of the areas inspected, one noncompliance was identified (inadequate protection of QA records from fire).

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DETAILS

1. Persons Contacted

*N. Kalivianakis, Superintendent
*L. Gerner, Assistant Superintendent, Administrative Support and Service
*J. Heilman, Quality Assurance, Operations
*C. Smith, QC Inspector
L. Butterfield, Store Supervisor
W. Burkamper, QC Supervisor
Z. Rudy, Central Files Supervisor
J. Wunderlich, Technical Staff
D. Rajevich, IM Supervisor

*Denotes those present at the exit interview on March 11, 1982.

2. Licensee Action on Previous Inspection Findings

(Closed) Open Item (254/81-07-02; 265/81-07-02): Procedural discrepancies. The licensee had revised Quality Procedure No. 4-51, removing the statement that the buyer authorizes shipment for use and installation. The licensee also revised Quality Procedure No. 15-51, removing the engineering disposition requirement and the deferring of the hold tag. The new procedures were Quality Procedure No. 4-51, May 15, 1981, Revision 11, Procurement Document Control for Operations - Processing Purchase Documents and Quality Procedure No. 15-51, May 15, 1981, Revision 10, Non-conforming Materials Parts and Components for Operations - Spare Parts and Materials.

(Closed) Unresolved Item (254/81-07-04; 265/81-07-04): Qualifications of Offsite Review Group (ORG) members in the Reactor Operations discipline were ambiguous. Qualifications for this discipline were revised in order to clarify the requirements for experience as a reactor operator. Procedures now require five years experience in reactor operations/NPP operations and experience as a reactor operator.

(Closed) Unresolved Item (254/81-07-05; 265/81-07-05): Newly hired buyers or Purchasing Agents were not administratively prohibited from working on QA related purchase orders until having received QA training. A memo issued on June 11, 1981 by N. E. Wandke prohibited new buying personnel from committing purchase orders for safety-related and/or ASME code requirements until completing the Indoctrination and Training Program for buyers.

(Closed) Noncompliance (254/81-07-01; 265/81-07-01): Procurement documents failed to impose the quality assurance program requirements of 10 CFR 50, Appendix B, and 10 CFR 21.

Quality Procedure No. 4-51 had been amended to state which safety-related purchases were to be covered by a Quality Assurance (QA) Program. Specifically, Safety-Related Commercial Grade procurements did not have to reference the provisions of 10 CFR 50, Appendix B,

and the manufacturer need not have an approved QA program. For these Safety-Related Commercial Grade procurements, acceptability "...shall be established and verified by receipt inspection under the applicable QA Program and, where applicable, by functional or operational checkout prior to being placed into operation." (QP 4-51 per 3.0)

Four recent Safety-Related Commercial Grade purchase orders were examined and found to comply with the licensee's approved QA program. 10 CFR 21 requirements were also found to have been properly applied.

(Closed) Noncompliance (254/81-03-01; 265/81-03-01): Failure to implement portions of ANSI N18.7-1976. Topical report CE-1-A was revised to clarify the commitment of older Commonwealth Edison nuclear plants to the revision of ANSI N18.7 which was effective at the time that the operating license was issued for that plant. In the case of the Quad-Cities Station, the applicable revision of ANSI N18.7 was the 1972 edition. As a consequence, examples of this noncompliance concerning preventive maintenance program, fluid system cleanliness program, and housekeeping program were not longer applicable.

The requirements for calibration of safety-related instrumentation in ANSI N18.7-1972, Paragraph 5.3.6, were essentially the same as those in ANSI N18.7-1976, Paragraph 5.3.7. The inspector determined that the instruments listed in the noncompliance were properly calibrated and were placed in an administrative system which should prevent recurrence of this problem. The licensee's actions in this area appeared to be acceptable.

The example of the records program was transferred for tracking purposes to another noncompliance number as described below.

(Closed) Noncompliance (254/82-07-01; 265/82-08-01): Failure to implement ANSI N45.2.9-1974, Requirements for Collection, Storage and Maintenance of QA Records. Revision 19, to Topical Report CE-1-A, Quality Assurance Program, changed Commonwealth Edison's commitment from the 1976 edition to the 1972 edition of ANSI N18.7 for the Quad-Cities, Dresden, and Zion Stations by referencing Safety Guide 33 - November 1972 instead of Regulatory Guide 1.33, Revision 2 - February 1978. It was felt by Quad-Cities Station management that, in this manner, the Quad-Cities Station would be demonstrated to have no commitment to ANSI N45.2.9 since ANSI N18.7-1976 committed automatically to ANSI N45.2.9 and the 1972 edition did not. However, Commonwealth Edison had committed directly to Regulatory Guide 1.88, Revision 2, since at least November 1978, in Topical Report CE-1-A. The regulatory position of Regulatory Guide 1.88, Revision 2, states that ANSI N45.2.9-1974 is acceptable as a basis for compliance with the pertinent requirements of 10 CFR 50, Appendix B. In addition, Revision 19 to Topical Report CE-1-A committed directly to ANSI N45.2.9-1974 (Draft 15, Revision 0, April 1974) and deletes the commitment to Regulatory Guide 1.88. The Quad-Cities Station had therefore been committed to the requirements of ANSI N45.2.9-1974 for over three years, independent of the Station's

commitment to ANSI N18.7. The Quad-Cities Station was cited for failure to meet storage facility requirements of ANSI N45.2.9-1974 (Inspection Reports No. 50-254/81-03; 50-265/81-03). The inspector observed that the Station's active files were still not protected from possible destruction by fire, neither are these records duplicated. Examples are completed Work Requests and completed Work Packages. In addition, QA documents such as completed surveillance data sheets and completed Work Packages were not purged from active files according to the Master Retention Schedule (MRS) as required by Procedure QDM-6 (Unresolved Item 254/81-03-08; 265/81-03-08). The MRS specified, for example, that completed surveillances be kept in the active files for one year and then be transferred to the Central Files. In practice, completed surveillances for the year 1981 would not be transferred to the Central Files until after December 31, 1982. In this way, the oldest document in the active files was not one year as implied by the MRS, but two years. This failure to follow the QDM was in violation of Paragraph 5.1.2 of ANSI N18.7-1972 which required that procedures be followed.

3. Exit Interview

The inspector met with licensee representatives denoted in Paragraph 1 at the conclusion of the inspection on March 11, 1982. The inspector summarized the purpose and the scope of the inspection and findings.

Telephone conversations between Region III and licensee management concerning the noncompliance in the Appendix to this report were held on March 31 and April 2, 1982.