



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

August 18, 1982

Mr. James G. Keppler, Regional Administrator
 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 I.E. Inspection Report
 Nos. 50-254/82-08 and 50-265/82-09
NRC Docket Nos. 50-254 and 50-265

Reference (a): R. L. Spessard letter to Cordell
 Reed dated July 19, 1982.

Dear Mr. Keppler:

The following is in response to the inspection conducted by Messrs. N. J. Chrissotomos and S. G. DuPont of activities at Quad Cities Nuclear Power Station, Units 1 and 2. Reference (a) identified certain items of noncompliance with NRC requirements. Our response to these items is provided in the attachment to this letter.

To the best of my knowledge and belief the statements contained in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address any questions you may have concerning this matter to this office.

Very truly yours,

L. O. DelGeorge
 Director of Nuclear Licensing

lm

Region III Inspector - Quad Cities

SUBSCRIBED and SWORN to
 before me this 18th day
 of August, 1982

Rosalie A. Puenta
 Notary Public

8209080142 820901
 PDR ADOCK 05000254
 Q PDR

AUG 19 1982

COMMONWEALTH EDISON COMPANY

Attachment

Response to Notice of Violation

NRC Docket Numbers 50-254 and 50-265

The items of Non-Compliance identified in the Appendix to the NRC letter dated July 19, 1982 are responded to in the following paragraphs:

1. Technical Specifications 6.2.A.6. states in part that "...detailed written procedures including applicable checkoff lists shall be prepared, approved and adhered to for preventive and corrective maintenance operations which could have an effect on the safety of the facility."

Quality Assurance Procedure QP 3.52 states in part that "The shift engineer shall clear the out of service cards and perform required operational tests to insure that equipment is operable and document same."

Contrary to the above, on May 31, 1982, the unit was returned to power operation after completion of maintenance on safety related equipment without the required testing being accomplished.

Corrective Action Taken and Results Achieved

As is described in Reportable Occurrence Report No. LER/RO 82-11/01T-0, testing of the number 4 Turbine Control Valve Fast Closure scram function was initiated at 0340 hours on June 5, 1982. The valve failed to fast-close on the last 10 percent of closure and no RPS Channel "B" trip was received. It was not recognized that the failure indicated that an RPS instrument subchannel was inoperable, and a manual RPS Channel "B" was not initiated until 13 hours later. A load reduction was performed, and with the reactor in the HOT STANDBY mode and generator off-line, a faulty connector in the RPS circuit was removed and the solenoid actuator for the fast-acting valve for control valve fast-closure was hard-wired. The fast-closure and scram functions were successfully tested for the number 4 Turbine Control Valve three times prior to putting the generator on-line.

Corrective Action to Avoid Further Non-Compliance

On June 16, 1982, an On-Site Review (82-19) was held with representatives of the Technical Staff, Maintenance, and Operating Departments. A detailed discussion of the missed surveillance test event took place. It was determined that the system being utilized for post-maintenance testing was adequate, but could be improved by requiring that each maintenance department (Mechanical, Electrical, and Instrument) list all maintenance projects performed during an outage for review by the Operating Engineer. He will determine appropriate testing requirements and add these items, as necessary, to the Master Outage Checklist (QGP 1-S3) for his review and sign-off prior to startup. A revision to QGP 1-S3 will be made to allow for documentation that the necessary tests are completed.

Date When Full Compliance Will Be Achieved

Full compliance is achieved at the present time. The above revision to QGP 1-S3 will be implemented by September 1, 1982.

2. Technical Specification 3.1.A. states "The setpoints, minimum number of trip systems, and minimum number of instrument channels that must be operable for each position of the reactor mode switch shall be as given in Tables 3.1-1 through 3.1-4. The system response times from the opening of the sensor contact up to and including the opening of the trip actuator contacts shall not exceed 50 milliseconds."

Table 3.1.3 states in part "The minimum number of operable or tripped instrument channels per trip system in the run mode for turbine control valve fast closure is 2."

Contrary to the above, on June 5, 1982, the licensee did not trip the "B" scram channel for the unit for thirteen (13) hours after discovery of the failed solenoid.

Corrective Action Taken and Results Achieved

The immediate corrective action, as discussed in LER/RO 82-11/01T-0, was to manually trip the "B" RPS Channel and reduce load to less than 40 percent power, where the turbine control valve fast closure scram is automatically bypassed. Included within the scope of On-Site Review 82-19 was a detailed discussion of the failure to adhere to Technical Specification Table 3.1-3. Further, training sessions were held with operations shift management personnel covering the RPS instrumentation operability requirements given in the Technical Specifications, including the necessary minimum number of operable or tripped instrument channels per trip system.

Corrective Action to Avoid Further Non-Compliance

Station surveillance test procedures covering operations surveillance will be reviewed to assure that these procedures contain adequate information for actions to take when instrumentation or components are determined to be inoperable. Proper references to Technical Specifications will be checked, and procedure revisions will be initiated where necessary.

Date When Full Compliance Will Be Achieved

Full compliance is achieved at this time. The above-mentioned procedure review will be completed and appropriate procedure revisions will be implemented by January 1, 1983.

3. Technical Specifications 3.5.H.1. states the "The systems installed to prevent or mitigate the consequences of flooding of the condensate pump room shall be operable prior to startup of the reactor."

Technical Specifications 3.5.H.3. states that "If Specification 3.5.H.1 and 2 cannot be met, reactor startup shall not commence or if operating, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition within 24 hours."

Contrary to the above, on June 3, 1982, the inspector discovered that the RHR service water pump vault door was left open with no one in attendance.

Corrective Action Taken and Results Achieved

After the open door was closed, discussions were held with the appropriate management personnel concerned with the work performed in the RHR service water pump vault, emphasizing the purpose of the flood control doors and systems, and the Technical Specification requirements for their operability. A memo stating this information has been issued to all Station Department Heads and to the Sub-Station and Station Construction Supervisors.

Corrective Action to Prevent Further Non-Compliance

It is felt that the above actions will prevent repetition of this event. In addition, a procedure change has been initiated to the QOA 900-7-A annunciator procedure for the "RHR Vault Door Open" control room alarm, so as to better clarify operator actions and to make the procedure more complete.

Date When Full Compliance Will Be Achieved

Full compliance is achieved at this time. The revision to QOS 900-7-A will be implemented by October 1, 1982.