



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 07, 1994

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Quad Cities Power Station Units 1 and 2;
NRC Docket Number 50-254 and 50-265;
NRC Inspection Report Numbers 50-254(265)/93032

Reference: Edward G. Greenman letter to R. Pleniewicz dated
March 07, 1994, transmitting Notice of Violation.
Inspection Report 50-254/93032; 50-265/93032

Enclosed is Commonwealth Edison's response to the Notice of Violation (NOV) transmitted with the referenced letter. The NOV cited one Severity Level IV violation, with three examples of failure to follow procedures. The examples involved; a failure to comply with chemical control procedures for Belzona use, an instrument maintenance technicians failure to follow procedures for returning an instrument transmitter to service, and a failure by mechanical maintenance supervision to follow procedures and ensure proper instructions for use of Argo packing were included in a work package.

The following commitments are being made by this letter:

- 1) The IM department Master will issue a policy memo regarding management expectations for independent verification by April 30, 1994.

If there are any questions or comments concerning this letter, please refer them to Marcia Jackson, Regulatory Performance Administrator at (708) 663-7287

Respectfully,

D. L. Farrar, Manager
Nuclear Regulatory Services

Attachment

cc: J. Martin, Regional Administrator, RIII
C. Patel, Project Manager, NRR
C. Miller, Senior Resident Inspector, Quad Cities

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**QUAD CITIES STATION
RESPONSE TO NOTICE OF VIOLATION
50-254(265)/93032**

VIOLATION:

Quad Cities Technical Specification 6.2.A states the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, shall be established and implemented. Regulatory Guide 1.33 Appendix A included plant operation and maintenance.

a. Quad Cities Instrument Administrative and Preventive Maintenance Procedure (QCIPM) 100-12, "Refuel Outage and Backfilling Reactor Instruments Sensing Lines," required that differential pressure instruments be returned to service, then lead sealed.

Contrary to the above, on November 30, 1993, Reactor Level Instrument, 1-263-57B, was not returned to service and lead-sealed in accordance with QCIPM 100-12.

b. Quad Cities Administrative Procedure (QCAP) 700-2, "Chemical Control" required consumable chemical products intended for use on process water systems be analyzed by the systems materials analysis department.

Contrary to the above, epoxy coating material (belzona) was used in the condensate and condensate booster pumps without the required analysis being performed.

c. Quad Cities Mechanical Maintenance Procedure (QCMM) 1515-7, "General Valve Packing Procedure" required, in part, that for specialty packing material, the supervisor in charge will determine any special considerations to be observed.

Contrary to the above, on December 24, 1993, valve packing instructions used to repack the 2-220-118A valve did not contain special instructions for the use of Argo specialty packing.

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

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REASON FOR THE VIOLATION:

CECo acknowledges the violation. In example "A", the reason for the violation was determined to be an inappropriate work practice or human error, caused by inadequate attention to detail and lack of self check (PIF 93-692).

However for examples "B" and "C", the station does not believe that these examples are due to procedure adherence for the following reasons:

In example "B" at the time of the violation, Quad Cities Station procedure QAP 1000-5 was in effect rather than QCAP 700-2. Procedure QAP 1000-5, step C.3.a requires that a working list of chemical products be maintained by the Station Chemical Control Coordinator. Table QAP 1000 T-2 (group 2 chemicals, limited stainless steel use, no floor drain disposal) lists Belzona (Ceramic R & S Metal) as items for minimal plant use only. Per the chemistry department, Belzona is considered a consumable product. By being placed in the table, its use in the plant was approved. Prior to November 1990, QAP 1000-5 listed Belzona as an unrestricted use material (Green label) and did not require SMAD to perform an analysis of chemical products intended for use on process water systems. After November 1990, QAP 1000-5 required SMAD testing, but a program inadequacy allowed Belzona to be placed on the limited use (Yellow label) list without testing by the authority of the Station Chemical Control Coordinator in accordance with the procedure. Therefore, the reason for this violation example was due to a program inadequacy and not a failure to follow procedures. The station adhered to procedure QAP 1000-5, in place at the time, for chemical control.

In example "C", on December 23, the maintenance worker was instructed to repack the valve. During the discussion of the valve repacking, an upgraded foreman, familiar with working with ARGO packing installation, gave the worker specific instructions on installing the packing into this particular valve. On the following day, the worker repacked the valve while referring to specific written instructions and diagrams (Valveman Data sheet, work package traveller, and reference "A", ARGO packing calculations). Therefore, special considerations were determined in accordance with QCMM 1515-7 by the guidance given to the worker prior to the job by the upgraded foreman and by the work instructions contained in the package.

Five rings of packing (3 composite and 2 graphite) were to be installed into the valve as per the Valveman datasheet. The worker was only able to install 4 rings (2

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composites and 2 graphite) before packing consolidation. The operator available to cycle the valve said he could only cycle the valve 1/4 of one turn. This was not enough to adequately consolidate the packing so that the fifth ring could be added. The worker re-installed the packing gland and returned to the shop. The worker informed Mechanical Maintenance management personnel that he could not install the fifth ring. The decision was made by the Mechanical Maintenance management that the packing would be removed and new packing installed. This work was completed on December 26, 1993. The work package contained the necessary special instructions and the worker was briefed prior to the job. Therefore, procedure QCMM 1515-7, "General Valve Packing Procedure", was adhered to.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Example A

The following corrective actions were taken at the time of discovery:

- (1) The 1-263-57B transmitter was valved into service by a CST.
- (2) The valve handles were lead-sealed in the correct position.
- (3) The CST involved in the event was disciplined.
- (4) This event was tailgated with all Instrument Maintenance department personnel.

Example B

The use of epoxy resin metal (including Belzona) has been restricted in its use at Quad Cities. Procedure QCGM 307-06 was implemented in February 1994, and requires that all applications of Epoxy-Resin metal replacement material/coating be evaluated by engineering prior to application.

Example C

Although the station believes that this example was not in violation of procedure QCMM 1515-7, the procedure QCMM 1515-7 is in the process of being revised to include more instructions for ARGO packing and to refer to the Valveman Data Sheet. A request for training on ARGO packing installation for all Mechanical Maintenance personnel has been submitted to the Training department.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

Example A

The Master Instrument Maintenance Department will create a department memo re-clarifying the expectations for the performance of independent verifications. This

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will be completed by April 30, 1994.

In addition to the above specific corrective action, the station is taking the following action to correct procedure adherence/personnel error events:

The station is currently conducting a Level 2 investigation into the trend of personnel errors at the station (254-230-94-00400). The investigation is planned to be completed by April 20, 1994 and at that time will issue recommendations for improving station performance and reducing human errors.

Example B

Epoxy-resin metal (including Belzona) use has recently been restricted in its use at Quad Cities Nuclear Power Station. QCGM 307-06 (Epoxy-Resin Metal Replacement Material/Coating Use and Control), has been implemented to provide instructions on its use and control. This procedure which was implemented in February 1994, requires that all applications of Epoxy-Resin metal replacement material/coating shall be evaluated by engineering before application.

Example C

Mechanical Maintenance acknowledges that a communication problem occurred and that the valve packing procedure requires revision. QCMM 1515-7 is in the process of being revised to include more instructions for ARGO packing and to refer to the Valveman Data Sheet. A request for training on ARGO packing installation for all Mechanical Maintenance personnel has been submitted to the Training department.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance with the violation for each of these issues was achieved with the correction of the problem at the date of discovery or the revision of the procedure.