

Commonwealth Edison Ouad Cities Nuclear Power Station 22710 206 Avenue North Cordova, Illinois 61242-9740 Telephone 309/654-2241

GGC-94-083

May 27, 1994

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

Attention: 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)/93005
- Reference: T. Martin letter to L. DelGeorge dated February 26, 1993, transmitting Notice of Violation. Inspection Report 50-254/93005; 50-265/93005

Enclosed is Commonwealth Edison's revision to the response to the Notice of Violation (NOV) transmitted with the referenced letter. The NOV cited three level IV violations involving; 1) improper classifications, 2) inadequate testing, and 3) inadequate maintenance on the HPCI check valves.

The following commitment is being changed by this letter:

1) The station will implement procedure QCOS 2300-16 for performing the Closed Stroke Test on the 1(2)-2301-39 check valves by June 7, 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,

For G. G. Campbell Station Manager

GGC/db

Attachment

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

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VIOLATION:

1.

10 CFR 50.55A Inservice Inspection Requirements requires, in part, that ASME Code Class 2 valves meet the requirements applicable to the code. Subsection IWV (IWV-1100, scope) of Section XI of the ASME code requires, in part, that check valve safety function be identified.

Contrary to the above, as of February 9, 1993, the licensee failed to identify that check valves 1-2301-39 and 2-2301-39, the Unit 1 and 2 HPCI suction check valves from the torus had a safety function in the closed direction.

This is a severity level IV violation.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

The station's original response was:

A formal update to the IST Program will be submitted by September 30, 1993. The updated program will require safety function verification of the open and close functions of the 1(2)-2301-39 valves. Additionally, valves identified during the review of similar valves will be added to the program as appropriate.

The station wishes to revise this response as follows: The station will develop and implement procedure QCOS 2300-16, for the closed stroke testing of the 1(2)-2301-39 check valves by June 1, 1994.

The planned update was delayed to incorporate changes identified by a selfassessment of the IST program. The self-assessment was initiated as a response to IST program comments received during the fall 1993 NRC Diagnostic Evaluation.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achived by with the implementation of procedure QCOS 2300-16 by June 1, 1994.