

September 8, 1983

Mr. C. E. Norelius, Chief Division of Project and Resident Programs - Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137

> Subject: Quad Cities Station Units 1 and 2 Response to Inspection Report Nos. 50-254/83-20 and 50-265/83-18 NRC Docket Nos. 50-254 and 50-265

Reference (a): C. E. Norelius letter to Cordell Reed dated August 16, 1983.

Dear Mr. Norelius:

This letter is in response to the inspection conducted by Mr. N. J. Chrissotimos on July 1 through August 1, 1983, of activities at Quad Cities Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

To the best of my knowledge and belie? the statements contained herein and in the attachment are true and correct. In some respects these statements are not based upon 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.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

D. L. Farrar Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - Quad Cities

SEP 81983

Commonwealth Edison Company

ATTACHMENT

Response to Notice of Violation

NRC Docket Numbers 50-254 and 50-265

The following paragraphs is the response to the item of noncompliance identified in the Appendix to the NRC ietter dated August 16, 1983.

Technical Specification 6.2.A.7 requires that detailed written procedures shall be adhered to covering surveillance and testing requirements. Core Spray Pump Discharge Functional Pressure Test procedure, QIS-23-2, step F.10, requires the Instrument Mechanic to open the isolation valve and seal it open. Weekly Suppression Chamber Level Verification procedure, (OS 1600-25, step F.3, requires the Operator to close and lock the local sightglass isolation valves.

- Contrary to the above, during the functional pressure test conducted on June 23, 1983, isolation valves on the Core Spray Discharge pressure switches 'C' and 'D' were left closed and sealed.
- Contrary to the above, during the weekly Suppression Chamber level verification conducted on July 12, 1983, an isolation valve on the Suppression Chamber sightglass was left opened and locked.

Quad-Cities Station acknowledges the fact that isolation valves on two of the Core Spray pressure switches and the Pressure Suppression Chamber sightglass were left mispositioned.

Corrective Action Taken and Results Achieved

 Upon discovery of this occurrence, the Core Spray pressure switches were immediately repositioned to their normal open status. An instrument valve audit was performed by Instrument Maintenance personnel which verified that no other instrumentation had been left inoperable. In addition, all surveillances for the previous month, which were completed by the individual responsible for the valving error, were double-checked to assure the proper valve configuration.

A "tailgate session" was conducted between the Instrument Maintenance Department personnel and Station Management as to the seriousness and potential repercussions of such errors. The Instrument Mechanic responsible for this error was disciplined for failure to follow Station procedures.

2. The immediate corrective action was to close and lock the isolation valve after performing the weekly Suppression Chamber Level Verification. An investigation identified the individual who inadvertently locked the wrong valve. While interviewing the individual, it became apparent that he had performed this surveillance correctly numerous times in the past and could not recall closing and locking the wrong valve. He was instructed in the future to pay attention to the work he is performing regardless of the number of times he has accomplished the chore. Likewise, at the weekly Operating Department meeting, all Operating personnel were reminded to concentrate on the job at hand.

Corrective Action to Avoid Further Non-Compliance

- To avoid an occurrence of a similar nature, a new system has been devised which will ensure that the instrument valves have been returned to their proper position. This system involves a second verification of the final valve position by a qualified individual. The verification is performed immediately following the completion of the surveillance. To document the second verification, a signoff has been added to those instrument surveillance procedure checksheets involving safety related equipment.
- 2. A review of the weekly Suppression Chamber level verification procedure was completed and was considered adequate. However, in an effort to avoid recurrence of this incident the procedure will be revised to further clarify the exact valves required to be isolated. Valve numbers will be assigned to these valves and identified as such in the procedure. A drawing change request will be initiated to accurately reflect the isolation valve numbers on the appropriate prints.

Date When Full Compliance Will Be Achieved

- All applicable QIS procedure changes have been submitted. Full implementation of these procedures will be accomplished by September 15, 1983. The new second independent verification system was implemented by July 1, 1983.
- The Weekly Suppression Chamber Level Verification procedure, QOS 1600-25, will be revised and implemented by October 10, 1983. The drawing change request which reflects the new valve numbers has been submitted.