



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 30, 1992

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2
Response to Open Item
Inspection Report Nos. 50-254/92002; 50-265/92002
NRC Docket Nos. 50-254 and 50-265

Reference: G.C. Wright letter to Cordell Reed dated
March 9, 1992 transmitting NRC Inspection
Report 50-254/92002; 50-265/92002

Enclosed is Commonwealth Edison Company's (CECo) response to the Open Item which was transmitted with the reference letter and Inspection Report. The Open Item concerned the completion, approval, and control of the Emergency Operating Procedures (EOP) development document which describes the differences between plant specific guidelines and the EOPs. CECo's response is provided in the attachment.

If your staff has any questions concerning this transmittal, please refer them to James Watson, Compliance Engineer at (708) 515-7205.

Sincerely,

T.J. Kovach for

T.J. Kovach
Nuclear Licensing Manager

Attachment

cc: A.B. Davis, Regional Administrator - Region III
L.N. Olshan, Project Manager, NRR
T. Taylor, Senior Resident Inspector

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ATTACHMENT A

RESPONSE TO OPEN ITEM NRC INSPECTION REPORT 50-254/92002; 50-265/92002

Open Item 254(265)/9200201

The inspector noted numerous differences between the Plant Specific Technical Guidelines (PSTG) and the EOP flowcharts which were not documented and were not identified during the licensee's Verification and Validation of the EOPs. These differences involve changes in sequence, changes in logic, and relocation of steps to other EOPs. Generally, these changes in EOP structure appeared to enhance the useability of the flowcharts. However, these differences were not reflected in the EOP/PSTG Comparison Document. Because of the uncontrolled nature of these changes, the potential exists for inconsistency in the operational strategy intended by the PSTG. From a procedure maintenance and revision standpoint, the differences between the PSTG and flowcharts should be documented and justified. The licensee had recognized the need for this documentation and had initiated an effort to document all differences between the PSTG and EOPs. The inspectors reviewed the draft "Development Document" for the three EOP flowcharts, which had nearly completed documentation, and found the level of detail was acceptable. Licensee completion, approval, and control of the development document will be tracked as an Open Item.

RESPONSE

Development of the "QGA Development Tracking" document began in September of 1991. This document will provide for the tracking of each step from the BWR Owners Group Guidelines to the actual QGA flowchart implementation. Identified differences will be discussed, documented, and justified as necessary. Currently 6 of 19 Owners Group Guidelines have been completed.

The draft "QGA Development Tracking" document should be developed by August 31, 1992. Allowing adequate time for a On-Site Review, applicable document revisions, and emerging Unit 1 refuel outage work, the document is expected to be implemented and controlled by December 31, 1992.