

NOTICE OF VIOLATION

Commonwealth Edison Company  
Quad Cities Station, Units 1 and 2

Docket Nos. 50-254; 50-265  
License Nos. DPR-29; DPR-30

During an NRC inspection conducted from June 3 through July 22, 1995, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

1. Technical Specification 6.2.A required that written procedures be established, implemented, and maintained covering activities recommended in Regulatory Guide 1.33, Rev. 2, Appendix A. Appendix A of Regulatory Guide 1.33 included plant procedures for maintenance that can affect safety related equipment.

- a. Quad Cities Mechanical Maintenance Procedure (QCMM) 300-4, "CRD Handling Equipment Positioning Using EPRI/Dominion Engineering CRD Equipment," Rev 0, dated June 7, 1993, Step I.1.e. required that workers engage latches to lock the carriage and winch cart together prior to loading the CRD on the cart elevator.

Contrary to the above, on July 8, 1995, workers failed to lock the carriage and winch cart together prior to loading CRD J-7 per work package Q23326, on the cart elevator (50-254/265-95005-01a).

- b. Quad Cities Administrative Procedure (QCAP) 200-15, "Work Activity Screening," interim procedure dated May 8, 1995, steps D.1. through D.5. required that a checklist (Appendix A of QCAP 200-15) be reviewed and completed before personnel begin work, documenting the potential risks of maintenance activities.

Contrary to the above, on July 22, 1995, checklists (Appendix A of QCAP 200-15) had not been completed to document the risks of high pressure coolant injection system troubleshooting (50-254/265-95005-01b).

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

2. Technical Specification 3.7.C.2 stated, "The doors of the RHR pump compartments shall be closed at all times except during passage in order to consider the LPCI mode of the RHR system operable."

Technical Specification 4.5.A.5 stated, "When it is determined that the LPCI mode of the RHR system is inoperable, both core spray sub-systems, the containment cooling mode of the RHR shall be demonstrated to be operable immediately ...."

Contrary to the above, on June 22, 1995, with Unit 1 at power, the door of the 1A RHR pump compartment was not closed at all times due to a mechanical maintenance test hose. The LPCI mode of RHR system was not declared inoperable during this period nor were both core spray sub-systems and the containment cooling mode of the RHR demonstrated to be operable immediately (50-254/95005-02).

This is a Severity Level IV Violation (Supplement I)

3. 10 CFR Part 50, Appendix B, Criterion XVI requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected, and that in the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.
  - a. Contrary to the above, from December 1994 to July 1995, conditions adverse to quality had not been promptly identified and corrected. The licensee failed to take prompt corrective action to repair 23 emergency lighting units, 19 of these lights were needed for the operation of safe shutdown equipment (50-254/265-95005-06a).
  - b. Contrary to the above, on July 11, 1995, an unannounced fire brigade drill was observed and the fire brigade was evaluated as not being effective. Corrective actions taken by the licensee in response to previous similar problems (fire brigade response timeliness), as documented in the Fire Protection Program Audit Reports 04-93-11 and 04-94-11, did not preclude the recurrence of this condition adverse to quality (50-254/265-95005-06b).
  - c. Contrary to the above, from December 1989 to July 1995, conditions adverse to quality had not been properly corrected. The licensee failed to take prompt corrective action for a high number of fire protection impairments (50-254/265-95005-06c).

This is a Severity Level IV Violation (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement of explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555 with a copy to the U.S. Nuclear Regulatory Commission, Region III, 801 Warrenville Road, Lisle, IL 60532-4351, and a copy to the NRC Resident Inspector at the Quad Cities Nuclear Station within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Lisle, Illinois  
this 2<sup>nd</sup> day of August 1995