



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

June 18, 1984

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Quad Cities Station Units 1 and 2
Response to Inspection Report Nos.
50-254/83-31 and 50-265/83-30
NRC Docket Nos. 50-254 and 50-265

Reference (a): C. E. Norelius letter to Cordell Reed
May 17, 1984.

(b): Bide Thomas letter to J. G. Keppler
dated February 24, 1984.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. N. J. Chrissotimos and A. D. Morrongiello on November 17, 1983 thru January 24, 1984, 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.

In addition to the corrective actions stated in the enclosure, per Reference (b), Commonwealth Edison has committed to a specific "Regulatory Improvement Program for Quad Cities Station". The actions initiated in that program supplement the corrective actions detailed herein and will further reduce the possibility of a similar event from recurring.

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
8780N

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ATTACHMENT

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

The items of noncompliance identified in the appendix of the NRC letter dated May 17, 1984 are responded to in the following paragraphs:

- A. Technical Specification 3.7.C.1 requires that secondary containment integrity shall be maintained during all modes of plant operation except when all of the following conditions are met: (a) The reactors are subcritical and Technical Specification 3.3.A is met; (b) The reactor water temperature is below 212 degrees F and the reactor coolant systems are vented; (c) No activity is being performed which can reduce the shutdown margin below that specified in Technical Specification 3.3.A; and (d) The fuel cask or irradiated fuel is not being moved in the reactor building.

Section 1.0.X of the Technical Specifications defines secondary containment integrity and specifies as one of its conditions that at least one door in each access opening is closed.

Contrary to the above, from 7:45 a.m. on November 10, 1983, until 1:15 p.m. on November 15, 1983, secondary containment integrity was not maintained in Unit 1 when two interlock doors in an access opening to the reactor building were improperly positioned open. During this period Unit 1 was operating at full power.

Discussion

At 1:30 p.m. on November 15, 1983, while performing routine plant inspections, both interlock doors to the Unit 2 Main Steam Isolation Valve (MSIV) room were found to be open while the room at the time was part of the Secondary Containment. This situation resulted in Secondary Containment integrity being in a degraded mode delineated by Technical Specification 3.7.C.1. Both ventilation penetrations and floor drain penetration were isolated immediately; thus, making the MSIV room part of the Turbine Building and restoring Secondary Containment integrity. Unit 2 was shutdown for refueling and no fuel was in the reactor vessel. Unit 1 was operating at approximately 99 percent of rated thermal power.

On November 9, 1983, the MSIV room was changed to part of the Reactor Building so the water could be drained from piping located in the room. On November 15, Maintenance personnel were found working in the room with both interlock doors propped open. These individuals had been told on November 10 that the room was part of the Turbine Building by a Shift Engineer. The Shift Engineer had missed the log entry which explained the change in status.

There were no procedures which explained the necessary actions to make the MSIV room part of the Reactor Building or Turbine Building. Also, there was no definite mechanism set-up to alert personnel at the MSIV room of the status of the room.

1. Corrective Action Taken and Results Achieved

On November 15, 1983, the shift foreman recognized that the MSIV room was open to the turbine building, the ventilation and floor drain penetrations were isolated immediately. This made the MSIV room part of the Turbine Building and restored Secondary Containment integrity.

2. Correction Action Taken to Avoid Further Noncompliance

A new procedure, QOP-020-2, "Maintaining Secondary Containment Integrity with the MSIV Room Part of the Turbine Building," was written. This procedure provides instructions and precautions to properly change the condition of the MSIV room. New signs declaring the status of the MSIV room were obtained. This sign system provides better administrative controls of the MSIV room status.

3. Date When Full Compliance Will Be Achieved

Full compliance is achieved at this time.

- B. Technical Specification 6.2.A.1 requires that detailed written procedures shall be prepared and approved covering normal startup, operation, and shutdown of the reactor, and other systems and components involving nuclear safety of the facility.

Contrary to the above, the licensee did not have an operating procedures that addressed the actions to be taken to change the configurations of the main steam isolation valve to or from its secondary containment status.

1. Correction Action Taken and Results Achieved

As discussed in the corrective action for Item A, an operating procedure was written detailing the actions required to change the configuration of the MSIV room.

2. Correction Action Taken to Avoid Further Noncompliance

An investigation was performed of possible problem areas which could result in the loss of Secondary Containment. Work requests are now screened to evaluate their possible impact on Secondary Containment.

3. Date When Full Compliance Will Be Achieved

Full compliance is achieved at the present time.