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Quad Cities Generating Station
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ESK-95-166

October 11, 1995

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)/95005

REFERENCE: Patrick L. Hiland Letter to E. S. Kraft, Jr.,
Dated August 25, 1995, Transmitting Notice of Violation

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violations transmitted with the referenced letter. This letter contains the response for the first violation, failure to follow maintenance procedures.

This letter contains the following commitments:

- 1) The training requirements for Control Rod Drive (CRD) removal and installation qualification will be revised to address equipment actually used in the field for removing and installing CRDs as per the submitted training requests. This shall be accomplished by the Station's Training department by October 31, 1995. (NTS # 2541009500501.01)
- 2) All Maintenance department personnel will be trained on the revision to Maintenance department Memo 800-01. This shall be accomplished by the Maintenance department by October 31, 1995. (NTS # 2541009500501.02)
- 3) Senior Station Management will hold meetings with the entire Maintenance department to reiterate their expectations for performing work under questionable circumstances. This shall be accomplished for the Maintenance department by November 30, 1995. (NTS # 2541009500501.03)
- 4) Maintenance department First Line Supervisors (FLSs) will be required to attend Conservative Decision Making training seminars. This shall be accomplished by the Maintenance department by December 31, 1995. (NTS # 2541009500501.04)

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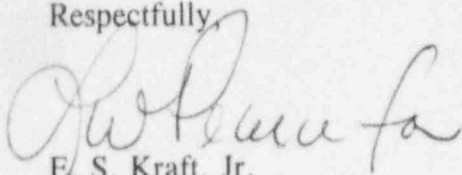
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- 5) Training on the use of QCAP 200-15, Appendix A will be completed by October 30, 1995.
- 6) Procedures QCMM 300-1 and 300-4 shall be further revised to include a verification that the latches are physically latched correctly prior to using the equipment to remove or install a CRD. This shall be accomplished by the Mechanical Maintenance department by November 15, 1995. (NTS # 2541009500501.06)

If there are any questions or comments concerning this letter, please refer them to Nick Chrissotimos, Regulatory Assurance, at (309)654-2241, extension 3100.

Respectfully,



E. S. Kraft, Jr.
Site Vice President
Quad Cities Station

Attachment

cc: H. Miller, Regional Administrator, RIII
R. Pulsifer, Project Manager, NRR
C. Miller, Senior Resident Inspector, Quad Cities

VIOLATION 50-254/265-95005-01

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).

Violation 254/265-95-005-01a:

Reason For Violation:

Workers failed to latch the Control Rod Drive (CRD) cart and carriage due to ineffective supervision, their lack of training and experience, and a less than adequate procedure.

Non-conservative decision-making was demonstrated by supervision in the assignment of work. The decisions made by supervision to perform scheduled work using mostly untrained and inexperienced workers and immediate supervision does not meet management expectations.

Reason For Violation: (cont.)

Only one individual (a worker) on the job had training on CRD removal and installation. This training was received in 1992 and included the procedures and hands-on EPRI/Dominion CRD cart removal equipment in a vendor mock-up. No individual on the crew, including the immediate supervisor, had any previous experience with actual CRD removal and installation.

The attempt to perform this task was further complicated by a less than adequate procedure. The procedure did not include a verification of the cart to be latched prior to loading the CRD. Mechanical Maintenance personnel who are experienced with the use of the CRD cart during actual CRD removal and replacement know the importance of verifying that the latch is properly latched. This important information had not been transferred to the procedure.

As a result of the failure to latch the CRD cart and carriage, the CRD cart moved after the CRD had been lowered a short distance. This caused the CRD to become cocked at the base of the reactor, thus not allowing the removal of the CRD. The sequence of events and the necessary rework also resulted in additional dose received by several personnel.

Corrective Actions Taken:

A supervisor with recent experience and training in CRD removal was called in to assist in removing the CRD. The CRD was removed without further incident.

Procedures QCMM 300-1 (O-Ring Replacement Using EPRI/Dominion Engineering CRD Handling Equipment) and QCMM 300-4 were revised on July 9, 1995 adding a note to ensure that the carriage and winch carts are in contact with each other prior to engaging the latches.

A training request was submitted on July 19, 1995 requesting establishment of a formalized training video for the EPRI/Dominion Engineering CRD handling equipment. A training request was also submitted to include the use of actual CRD installation and removal equipment.

Maintenance department Memo 800-01 (Maintenance department Qualification Program) was revised on October 4, 1995 to clarify the use of personnel (both supervisory and craft) with limited or no training and/or experience on tasks.

Action Taken To Prevent Further Occurrence:

The training requirements for CRD removal and installation qualification will be revised to address equipment actually used in the field for removing and installing CRDs as per the submitted training requests. This shall be accomplished by the Station Training department by October 31, 1995. (NTS # 2541009500501.01)

Action Taken To Prevent Further Occurrence: (cont.)

All Maintenance department personnel will be trained on the revision to Maintenance department Memo 800-01. This shall be accomplished by the Maintenance department by October 31, 1995. (NTS # 2541009500501.02)

Senior Station Management will hold meetings with the entire Maintenance department to reiterate their expectations for performing work under questionable circumstances. This shall be accomplished for the Maintenance department by November 30, 1995. (NTS # 2541009500501.03)

Maintenance department First Line Supervisors (FLSs) will be required to attend Conservative Decision Making training seminars. This shall be accomplished by the Maintenance department by December 31, 1995. (NTS # 2541009500501.04)

Procedures QCMM 300-1 and 300-4 shall be further revised to include a verification that the latches are physically latched correctly prior to using the equipment to remove or install a CRD. This shall be accomplished by the Mechanical Maintenance department by November 15, 1995. (NTS # 2541009500501.06)

Date When Full Compliance Will Be Met:

Full compliance will be met with the completion of all corrective actions by December 31, 1995.

Violation 254/265-95-005-01b

Reason for Violation:

The root cause is the failure to perform adequate training on the newly established procedure (QCAP 200-15). In particular, the responsibilities of the individual in charge of the job (usually the First Line Supervisor). The Electrical, Instrument, and Mechanical Maintenance groups have not been given formalized training on the procedure.

Corrective Actions Taken:

At the time of the identified occurrences, QCAP 200-15, Appendix A (red sheet) forms were completed in order to continue with the work activities.

Actions to Prevent Further Recurrence:

QCAP 1100-04 (Procedure Revision, Review, and Approval) has been revised (effective September 5, 1995) to require notification of affected departments for required training on new or revised procedures. This required training must be completed prior to the effective date of the new or revised procedure.

Training on the use of QCAP 200-15, Appendix A (Red Sheet) will be provided and documented for all Maintenance department supervisors. An information packet detailing expectations and accountability has been developed and will be tailgated with each Maintenance department supervisor. Actions shall be completed by October 30, 1995. (NTS # 2541009500501.05)

Date When Full Compliance Will Be Met:

Full compliance will be met with the completion of the corrective actions on October 30, 1995.