

SCO/SCB

IE-01

November 9, 1995

EA 95-241

Mr. E. Kraft, Site Vice President
Quad Cities Station
Commonwealth Edison Company
22710 206th Avenue North
Cordova, IL 61242

SUBJECT: NRC INSPECTION REPORT NOS. 50-254/95007 & 50-265/95007 AND
NOTICE OF VIOLATION.

Dear Mr. Kraft:

From September 2 through October 18, 1995, C. Miller and others of this office, and R. Ganser of the Illinois Department of Nuclear Safety conducted an inspection of your facility. This inspection included a review of authorized activities for your Quad Cities Nuclear Power Station facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

The areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of this inspection, the NRC has determined that a violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. This violation is of concern because your staff failed to assure that test instrumentation met the acceptance limits contained in applicable design documents.

We are concerned about the number of failures and the loss of availability of safety equipment during the report period. Further, the lack of definitive root causes for the failures of the standby diesel generator and the high pressure coolant injection system, coupled with inadequate corrective actions for safety related electrical bus overloading, appeared to have contributed to the equipments' unavailability.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. Specifically you should address methods taken to control design critical information as it applies to surveillance testing. You should also address measures taken to ensure station procedures and technical specifications are being implemented at all levels of the organization. After reviewing your response to this Notice, including your proposed corrective actions and the results of future

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inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In addition, two apparent violations were identified and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600 (60 FR 34381; June 30, 1995). The apparent violations involve: 1) the failure to take corrective actions to address previously identified safety related 480 Vac motor control centers (MCCs) that were overloaded under certain operating conditions, and 2) the failure to establish an effective program to control MCC load growth to prevent MCC feed breaker tripping due to overloading. Accordingly, no Notice of Violation is presently being issued for these inspection findings. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

A pre-decisional enforcement conference to discuss these apparent violations has been scheduled for November 21, 1995, at 10 a.m. (CST) in the Region III office in Lisle, Illinois. The decision to hold a pre-decisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information to enable the NRC to make an enforcement decision, such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violation sooner, corrective actions, significance of the issues and the need for lasting and effective corrective action. In particular, we expect you to address: 1) the root cause(s) of this event including the missed opportunities to correct this condition when previously identified at Dresden and when previously reported to Quad Cities by Commonwealth Edison Corporate Engineering; 2) the method Quad Cities will use to ensure that future load growth will be adequately controlled to prevent electrical systems from becoming overloaded; 3) the safety significance of a potential overload trip on one or more MCCs; and 4) site ownership of electrical load management and Site Engineering's capabilities to address these issues.

In addition, this is an opportunity for you to provide any information concerning your perspectives on: 1) the severity of the violations, 2) the application of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and 3) any other application of the Enforcement Policy to this case, including the exercise of discretion in accordance with Section VII.

You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding these apparent violations is required at this time.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room (PDR). To the extent possible, your response

should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

William L. Axelson, Director
Division of Reactor Projects,

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

Enclosures:

1. Notice of Violation
2. Inspection Report
 No. 50-254/95007(DRP);
 No. 50-265/95007(DRP)

cc w/encl: J. C. Brons, Vice President,
 Nuclear Support
 J. S. Perry, Vice President, BWR Operations
 L. W. Pearce, Station Manager
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bcc w/encl: J. Lieberman, OE
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*OE Concurrent
via E-MAIL
FROM J. Ball
11/7/95*

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