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ESK-95-153

September 26, 1995

Director, Office of Enforcement
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 responses for the last two violations a) Failure to follow Technical Specifications with regards to control of RHR Watertight doors, and b) Problems noted in the Fire Protection Program. As per our phone discussion with Mr. P. Hiland, of Region III, on September 26, 1995, the response to Violation 1, Failure to follow maintenance procedures, will be sent to you by separate transmittal by October 11, 1995.

This letter contains the following commitments:

For Violation 95-005-02:

No commitments are being made.

For Violation 95-005-06:

- 1) Station will implement administrative guidance for taking Electrical busses which supply power to Emergency Light Packs (ELP) Out of Service (OOS) by November 19, 1995.
- 2) Station will complete an examination of ELP failures by December 31, 1995.
- 3) Fire Brigade drill evaluations will be completed by September 30, 1995.
- 4) Fire Brigade training will be complete by December 31, 1995.

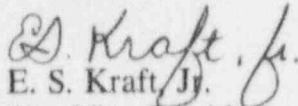
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- 5) An independent assessment of critiques and fire brigade performance will be completed by December 31, 1995.
- 6) A review of fire brigade make-up and necessary revision to QAP 300-3 will be completed by October 31, 1995.
- 7) The station's investigation in PIF 95-2358 will be completed by October 19, 1995.
- 8) Actions identified in PIF 95-2358 will be in place by December 19, 1995.

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 50-254/265-95005-02

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).

REASON FOR VIOLATION:

The violation concerning declaring the LPCI mode of RHR inoperable resulted from insufficient administrative controls on the operation of the watertight doors to the RHR pump compartments. Prior to this occurrence, notification of the Operations Department of opening of the watertight doors for purposes other than passage was not required. As a result, the Operations department was not made aware of the inoperability of the RHR pumps in the affected compartment.

Demonstration of the operability of the Containment Cooling mode of RHR and the Core Spray subsystems would not have been performed because Technical Specification 4.5.A.5 was not in effect. This requirement was eliminated in Amendment 144 (DPR-29) and Amendment 140 (DPR-30) which were dated March 8, 1994.

CORRECTIVE ACTIONS TAKEN:

All plant watertight doors were verified to be properly secured following identification of this deficiency.

QCAP 250-6, "Control of In-Plant Watertight 'Submarine' Doors," was implemented on July 12, 1995, to provide administrative controls for the operation of watertight doors.

Notification of the new administrative controls was provided to all site personnel via the station's "Daily Link" on July 11 and 12, 1995. Additional training material was sent to all Department Heads for inclusion in weekly departmental tailgate meetings.

ACTIONS TO PREVENT FURTHER OCCURRENCE:

No additional actions other than those stated above are needed to prevent further occurrence of this type of event at the station.

DATE WHEN FULL COMPLIANCE WILL BE MET:

Full compliance was met on July 12, 1995 with the issuance of QCAP 250-6.

VIOLATION 50-254/265-95005-06

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).

a. Emergency Light Packs

Reason for Violation:

The primary reason for the large number of inoperable emergency light packs (ELP) was a lack of administrative control. There was no mechanism in place which tracked the number or location of ELPs unavailable. If an ELP was inoperable, no guidelines or requirements existed regarding compensatory measures or notifications.

Secondary reasons for the inoperable ELPs were: first, the lack of priority given to the work requests written on the ELPs. Second, ELPs are made inoperable when electrical busses are taken OOS. Without normal power, the ELP battery packs discharge to the point where they must be replaced.

a. **Emergency Light Packs (cont.)**

Corrective Actions Taken:

All inoperable 8-Hour Appendix R Safe Shutdown ELPs identified by the NRC Inspection were immediately repaired.

QCAP 1500-1, Administrative Requirements for Fire Protection, and QCAP 1500-13, Fire Protection Impairments, have been revised to include ELPs. The revisions provide the operability, surveillance, compensatory and reporting requirements for the ELPs. This change will ensure proper compensatory measures are put in place or Safe Shutdown LCOs entered until the light packs are repaired.

Actions to Prevent Further Occurrence:

A future change will be made to the administrative procedures to provide additional guidance to operations when out of services are performed on electrical busses that provide charging power to the ELPs. These changes will protect battery packs from being completely discharged during the out of service.

The failure rate of the ELPs will be investigated. The application, location, surveillance and battery replacement frequency of the ELPs will be examined to ensure the light packs are being used in the most favorable manner as plant conditions and manufacturers recommendations allow. This will be accomplished while gathering data and performance criteria for the Maintenance Rule implementation. An improved performance of the ELPs will be realized if the criteria in the Maintenance Rule can be achieved.

Date When Full Compliance Will Be Met:

Administrative changes to provide guidance when electrical busses that supply power to the ELPs are taken OOS will be in place by November 19, 1995.

The examination of ELP failures will be complete by December 31, 1995.

b. **Fire Brigade Performance**

Reason for Violation:

The fire brigade was ineffective in their response and fire fighting tactics. The response time was four minutes greater than the average goal for this type of drill and was excessive. Additionally, a critical assessment was not apparent from the review of the fire brigade drills. There were few weaknesses noted in previous fire drill critiques.

Reason for Violation: (cont.)

The untimely response of the fire brigade was primarily due to the lack of urgency for personnel to respond. Through the results of fire brigade member interviews, it was revealed that the urgency is reduced when members know the alarm is a drill since they know the plant is in a safe condition.

A contributing factor was the designation of the brigade members. Since the worst case scenario is practiced during these drills to simulate accident conditions, the specific five men assigned to the fire brigade are utilized instead of the first five responders. The current manning for the brigade includes the Outside Equipment Operator (EO) who was performing duties outside the Radiological Protected Area when prompted to respond. It was necessary for him to traverse through the protected area access control prior to assembly.

The lack of an effective critique for this and previous drills was caused by inadequate utilization of fire protection personnel. An insufficient quantity of evaluators was assigned to the drills. This resulted in an inability to view all aspects and actions of the fire brigade.

Corrective Actions Taken:

To improve the response and performance of the quarterly fire brigade drills, the Fire Marshal and the Shift Engineers are continuing to review and enforce response time and tactical performance expectations established for Fire Drills with members of the Fire Brigade.

Goals are being established for response times, as the times may vary depending on location of the fire drill. These goals have been utilized during third quarter fire drills to determine a pass or fail condition.

Third quarter brigade fire drills are being conducted on a greater frequency to evaluate the performance of the brigade. The evaluations are conducted with more evaluators present so that more aspects of the fire drill may be observed and examined. Strengths or weaknesses will be addressed in future brigade training. Additional support for the evaluations are being provided by the Fire Training Instructors and members of the Fire Protection Engineering Team.

Actions to Prevent Further Occurrence:

Evaluation of third quarter 1995 drills are continuing. A review of the standards that are expected during the performance of a fire drill will be accomplished during these evaluations. Standards will include the necessity that the urgency for a fire drill must be similar to that of an actual fire. The results of the third quarter evaluations will be utilized by the Fire Training instructors and Fire Marshal to improve the training received by members of the fire brigade.

A review of fire brigade training for donning turnout gear and effective tactical response will be conducted. This action will continue to be evaluated during the remainder of the third and fourth quarter fire drills. This will also be performed during a new training evaluation to determine the root cause of a delayed response time for the brigade members.

A review of QAP 300-3, Shift Manning, will be performed to insure proper personnel have been chosen to respond to fire incidents. Currently, the fire brigade consists of the Shift Supervisor, Radwaste Supervisor, Radwaste EO, Outside EO and Roving Extra EA. Previously, there have been fire drill response delays due to location or availability of the Outside Operator. The change being investigated includes assigning the Designated Extra EA to replace the Outside EO on the fire brigade. This would include a change to QAP 300-3, Shift Manning.

An independent evaluation of the fire brigade and assessment of the fire brigade critiques will be performed by the Site Quality Verification department as a follow up action.

Date When Full Compliance Will Be Met:

Fire Brigade drill evaluations will be complete by September 30, 1995.

Fire Brigade training will be complete prior to December 31, 1995.

Independent assessment of the critiques and fire brigade performance by Site Quality Verification as a follow up action will be completed prior to December 31, 1995.

Reviewing the make-up of the Fire Brigade and any necessary changes will be complete prior to October 31, 1995.

c. **Fire Impairments**

Reason for Violation:

The primary reason for the large number of open fire impairments is the result of failure to follow corrective actions developed after a similar finding previously identified.

Corrective Actions Taken:

PIF# 95-2358 was written on September 7, 1995 to identify the problem of fire impairments not being placed on the plan of the day as required and exceeding their 14 day Limiting Condition for Operations (LCOs). This PIF was also written to address the effective implementation of the impairment program.

Operations identified and cleared the impairments that could be closed if the reason for the impairment had been removed or repaired. The remaining impairments were placed on the Plan of the Day (POD) as required.

Actions to Prevent Further Occurrence:

PIF# 95-2358 (Level III to Operations) will be investigated to determine why the previous corrective actions identified to resolve the issue of not tracking fire impairments were not being followed.

The Fire Marshal, System Engineers, and Work Control Supervisor will be properly prioritizing, scheduling and tracking the fire impairments on the POD to ensure an expedient closure. In conjunction with this effort, the work requests that are associated with the inoperability of fire systems will be given a B priority to insure the correct emphasis is given to the LCO created by the fire impairment.

Date When Full Compliance Will Be Met:

PIF# 95-2358 will be complete by October 19, 1995.

Corrective actions identified in PIF# 95-2358 will be in place by December 19, 1995.