



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

June 12, 1992

U.S. Nuclear Regulatory Commission
Washington, DC 20555



Commonwealth Edison
SAFEGUARDS INFORMATION
No. 10

Attention: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-254/92006; 50-265/92006
NRC Docket Nos. 50-254 and 50-265

Reference: L.R. Greger letter to Cordell Reed dated April 8, 1992
transmitting NRC Inspection Report 50-254/92006;
50-265/92006

Enclosed is the Commonwealth Edison Company (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter and Inspection Report. CECo has reviewed the proposed violation and believes that the facts do not support a violation of 10 CFR 26.24(a)(3). CECo's review of the event indicates that a determination of Fitness For Duty was made in accordance with both CECo and the contractor firm's policies and training, which fully meets the intent of 10 CFR 26.24(a)(3). For these reasons, CECo respectfully requests the NRC to reconsider the violation.

Based on discussions between CECo and NRC Region III technical personnel subsequent to the inspection, it is CECo's understanding that the NRC technical staff's view is that For Cause Testing is required based solely on the detection of the odor of alcohol. A brief review of industry practice, relative to For Cause Testing based on the detection of the odor of alcohol, shows that Fitness For Duty Program requirements differ. Given this, CECo requests that this issue be addressed in a technical forum.

If your staff has any questions or comments concerning this transmittal, please refer them to Jim Watson, Compliance Engineer at (708) 515-7205.



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Sincerely,

P. L. Barnes for

T.J. Kovach
Nuclear Licensing Manager

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Attachments

cc: A.B. Davis, Regional Administrator - Region III
L. Olshan, Project Manager, NRR
T. Taylor, Senior Resident Inspector

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SECURITY MARKING DOES NOT APPLY WHEN THIS
LETTER IS SEPARATE FROM THE ENCLOSURE

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