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ESK-96-045

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April 3, 1996

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)/95010
Reference	Patrick Hiland Letter to E. S. Kraft, Jr., Dated March 7, 1996, Transmitting Notice of Violation

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violation transmitted with the referenced letter. The NOV cited one Severity Level IV violation concerning the failure to assure that design control measures were established for the selection and review for suitability of application of parts that are essential to the safety-related functions of systems, and that design changes shall be subject to design control measures commensurate with those applied to the original design.

This letter contains no new commitments, all actions stated in the response will be tracked under the Licensee Event Report (LER) that investigated the event (LER 254-95-009).

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,

Edward S. Kraft, J.

Site Vice President

Attachment

- cc: H. Miller, Regional Administrator, RIII
  - R. Pulsifer, Project Manager, NRR
  - C. Miller, Senior Resident Inspector, Quad Cities
  - D. Tubbs, R. Singer, MidAmerican Energy Company

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### VIOLATION 254/265-95010-02

#### STATEMENT OF VIOLATION

Criterion III, "Design Control", of 10CFR Part 50, Appendix B, requires in part, that design control measures shall be provided for verifying or checking the adequacy of design, and that measures shall be established for the selection and review for suitability of application of parts that are essential to the safety-related functions of systems, and that design changes shall be subject to design control measures commensurate with those applied to the original design.

Contrary to the above, on or about December 9, 1992, work package Q84914 was implemented to replace the solenoid for the Unit I HPCI steam line drain valve, 1-2301-28, with another solenoid of different design (ASCO solenoid part number 2063812-VF) without specifying that a vertical orientation was required by ASCO Installation and Maintenance Instructions. (50-254/95010-02)

### **REASON FOR VIOLATION**

The root cause for this violation was inadequate design change review.

### CORRECTIVE ACTIONS TAKEN

- 1. The solenoid for the 1-2301-28 valve was remounted in the correct orientation and tested for operability.
- The solenoids for the rest of the HPCI system air operated valves on both units were walked down to verify proper orientation.
- 3. All solenoid valves of this manufacturer and model number have been walked down with the exception of the Unit 2 Reactor Head Vent valves (which will be walked down under corrective action #1 below), and verified to be in the proper orientation.

## ACTIONS TO PREVENT FURTHER OCCURRENCE

- Solenoid operated valves which are listed in the Master Equipment List as safety-related will be walked down to verify proper orientation (NTS #2541809500907, Due 6/1/97).
- This event will be reviewed by the Design Engineering Department with the Electrical Maintenance Department to emphasize that proper orientation of solenoids is important (NTS #2541809500902). (COMPLETE)
- This event will be reviewed with the Design Engineering Group to emphasize the need for proper review of available design requirements prior to issuing engineering direction (NTS #2541809500903). (COMPLETE)

- 4. The Electrical Maintenance procedures, QCEMS 250-7 and QCEM 600-2, for installation of ASCO Solenoid Valves will be revised to include a precaution to verify the proper orientation of the solenoid valve when installed. (NTS #2541809500904, Due 5/15/96)
- 5. Design Engineering will review their procedures to ensure that a verification of the proper form, fit and function of equipment is performed in the design process (NTS #2541809500905, Due 5/31/96).
- Procurement Engineering will review their procedures to ensure that a verification of the proper form, fit and function is performed when providing parts. (NTS #2541809500906, Due 4/30/96).

# DATE WHEN FULL COMPLIANCE WILL BE MET

Full compliance was achieved with the remounting of the 1-2301-28 solenoid valve on 12/22/95.