



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

June 12, 1992

DCD

U.S Nuclear Regulatory Commission
 Washington, D.C. 20555

Attention: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2
 Response to Notice of Violation
 Inspection Report Nos. 50-254/92011; 50-265/92011
NRC Docket Nos. 50-254 and 50-265

Reference: B. Clayton letter to Cordell Reed dated May 14, 1992,
 transmitting NRC Inspection Report 50-254/92011;
 50-265/92011

Enclosed is the Commonwealth Edison Company (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter and Inspection Report. The NOV cited one Level IV violation with two examples of events associated with inadequate procedures. CECo's response is provided in Attachment A.

If you staff has any questions or comments concerning this response, please contact Jim Watson, Compliance Engineer at (708) 515-7205.

Sincerely,

A.L. Barnes
 for

T.J. Kovach
 Nuclear Licensing Manager

Attachment

cc: A.B. Davis, Regional Administrator- Region III
 L. O'ishan, Project Manager, NRR
 T. Taylor, Senior Resident Inspector

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION NRC INSPECTION REPORT 50-254/92011; 50-265/92011

VIOLATION: (254/92011-01a and 01b)

10 CFR, Part 50, Appendix B, Criterion V requires, in part, that activities affecting quality shall be prescribed and accomplished in accordance with instructions of a type appropriate to the circumstances, which shall include acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above:

- a. Work instructions for the February 6, 1991, repair for the high pressure coolant injection (HPCI) turbine stop valve were not a type appropriate to the circumstances. The instructions failed to include requirements to assure adequate clearances between the poppet guide and valve poppet during valve repairs resulting in a subsequent HPCI stop valve failure.
- b. The surveillance procedure used during the March 29, 1992, Unit 2 vessel hydrostatic test, was not a type appropriate to the circumstance. The procedure failed to provide steps to assure that the temperature at all vessel locations during hydrostatic testing were maintained equal to or above the limit required by Technical Specification 3.6.B.1 as shown in the appropriate curve of Figure 3.6-1.

This is a Severity Level IV Violation (Supplement 1).

REASON FOR THE VIOLATION: (254/92011-01a)

Concerning the issue relative to the HPCI turbine stop valve, CECO acknowledges the violation. The cause of the event was due to inadequate work instructions during a previous overhaul of the valve in February 1991. During this work, a crack was discovered in the weld joining the poppet guide to the valve cover during disassembly and inspection of the valve. The weld was repaired in the field. The welding caused the guide to become oval shaped and to lose perpendicularity with the bonnet. No dimensional verifications or alignment checks were requested or stated in the work instructions prior to or after the welding work was finished. This condition caused galling and the valve to become stuck open during a subsequent HPCI valve stroke test.

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CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED: (254/92011-01a)

The Unit 1 HPCI stop valve poppet guide and cover were replaced. The stop valve was reassembled and tested.

On February 19, 1992, QCOS 2300-1, "Periodic HPCI Pump Operability Test," was successfully completed and HPCI was declared operable.

CORRECTIVE STEPS TO AVOID FURTHER VIOLATION: (254/92011-01a)

A work analyst guideline has been prepared as a supplement to the existing procedure and issued to aid the work analyst in completing work packages. This guide was issued in April 1991.

A sample of Unit 2 work packages performed by contractors involving detailed reassembly has been reviewed for the presence of proper tolerance criteria. This review was completed in April 1992. From this review, no work packages were identified as requiring additional tolerance criteria.

This event was reviewed with Quality Control personnel, Mechanical Maintenance Work Analysts and Engineering Construction personnel cautioning them to look for proper tolerances during reassembly of critical components.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED: (254/92011-01a)

Full compliance was achieved on February 19, 1992, when the HPCI system was successfully tested and declared operable.

ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION NRC INSPECTION REPORT 50-254/92011; 50-265/92011

REASON FOR THE VIOLATION: (254/92011-01b)

Concerning the issue relative to Unit 2 vessel hydrostatic test, CECO acknowledges the violation. The cause of this event is personnel error. The Shift Engineer performing the test also wrote procedure QCOS 201-7, "Reactor Vessel and Class 1 Systems Ten Year Hydrostatic Test." He understood the RPV pressure/temperature curve requirements. The actual temperature points, however, were insufficiently monitored during the test to assure compliance with the minimum required temperature. Contributing causes of the event were lack of specific guidance in the QCOS 201-7 procedure for monitoring RPV temperature points, and inadequacies in the HLA program which did not require a dedicated briefing of the evolution for subsequent shifts.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED: (254/92011-01b)

The test was suspended and immediate actions were taken to restore the RPV to within the required temperature/pressure range of the technical specification.

The performance of the Shift Engineer was reviewed and appropriate disciplinary action was administered.

CORRECTIVE STEPS TO AVOID FURTHER VIOLATION: (254/92011-01b)

The procedure QCOS 201-7, along with QCOS 201-4, "Reactor Vessel and Primary Systems Leakage Test," will be revised to clearly state which thermocouples are essential during the performance of these two procedures. This revision will also provide a better method to document at what interval the thermocouples are to be monitored and the minimum thermocouple temperature requirements. A note will be added to make personnel aware of the effect that the cool water can have on RPV temperature when the CRD system is started. These procedures will be revised prior to use.

The HLA program will be revised to require 1) dedicated briefings of the evolution for subsequent shifts, 2) a discussion of each briefing of the limitations and actions, and 3) clear lines of authority and responsibility (e.g. parameter monitoring, for the HLA evolution. Program revisions will be completed by July 31, 1992. Additionally, QTA 010-4, "Preparation, Performance, and Review of Special Operational Tests," will also be revised by July 31, 1992, to reflect these guidelines.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED: (254/92011-01b)

Full compliance was achieved on March 29, 1992 when the RPV temperature/pressure was restored to the technical specification requirements.