



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

July 23, 1992

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2
Response to Notice of Violation and Open Item
Inspection Report Nos. 50-254/92012; 50-265/92012
NRC Docket Nos. 50-254 and 50-265

Reference: H.J. Miller letter to Cordell Reed dated June 23, 1992
transmitting NRC Inspection Report 50-254/92012; 50-265/92012

Enclosed is the Commonwealth Edison Company (CECo) response to the Notice of Violation and Open Item which were transmitted with the reference letter and Inspection Report. The Level IV Violation concerned an inadequate Safety Evaluation which did not document the basis to determine that an unreviewed safety question did not exist. Additionally, an Open Item identified a weakness with post-modification testing of check valves. CECo's response to the above items is provided in the attachment.

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

Sincerely,

P. L. Barnes for

T.J. Kovach
Nuclear Licensing Manager

Attachment

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

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RESPONSE TO NOTICE OF VIOLATION

**NRC INSPECTION REPORT
50-254/92012; 50-265/92012**

VIOLATION: (265/92012-02)

10 CFR 50.59(b) (1) requires, in part, that licensee records must include a written safety evaluation which provides the bases for the determination that a change does not involve an unreviewed safety question.

Contrary to the above, 10 CFR 50.59 Safety Evaluation (SE) 92-77 dated March 11, 1992, in support of Temporary Modification No. 92-2-61 for repair of a leaking tube in the cooler, did not provide a basis for the determination that removing a portion of an internal support to the 2C room cooler in the B/C residual heat removal service water pump vault did not involve an unreviewed safety question.

This is a Severity Level IV violation (Supplement I).

THE REASON FOR THE VIOLATION:

CECo acknowledges that the documentation for Safety Evaluation 92-77 was not adequate. This was a result of focusing the evaluation upon the heat transfer capability of the room cooler and the effects of a failure of the temporary repair. The evaluator failed to document an evaluation of the internal support acceptability in the modified configuration. Also, the evaluator failed to utilize guidance provided in section C.5.c of QAP 1100-12, "Conduct of 10 CFR 50.59 Safety Evaluations and Screening", which describes examples of questions that can be used to determine if an item may increase the probability of a malfunction of equipment important to safety.

In addition, the safety evaluation in question was performed prior to completion of an enhanced training program for preparers and reviewers of 10 CFR 50.59 evaluations. This course provided additional instruction with regard to the procedural requirements of QAP 1100-12.

THE CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

A review of this temporary alteration was performed which concluded that the temporary alteration would not affect the remainder of the room cooler tubes, and as a result, would not impact the operability of the room cooler. The safety evaluation in question has been supplemented to document the results of this evaluation.

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THE CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Enhanced training for preparers and reviewers of safety evaluations was conducted from March 11, 1992 through March 31, 1992. This course consisted of five days of training which included topics on accident analyses and safety evaluation philosophy. In addition, safety evaluations were prepared for postulated events and these evaluations were critiqued with regard to procedural compliance and thoroughness of review. As documented in the inspection report, a review of safety evaluations performed subsequent to the enhanced training demonstrated noticeable improvement in safety evaluation training.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on July 23, 1992, with the addition of the supplemental information to the safety evaluation in question.

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OPEN ITEM: (254/92012-01)

During six interviews of the technical staff, it was repeatedly found that engineers were relying on maintenance work planners or design engineers to prescribe post-maintenance and post-modification testing. This conflicted with the station procedure for technical staff engineers (i.e., QAP 1270-14, Revision 3, "Guidelines for Development of Modification Tests", Paragraph e.1), which stated that additional testing may be required to fully test the modification. The additional testing referred to testing beyond the minimum testing requirements provided by design engineering for engineer assisted modifications.

The procedural requirements provided were ambiguous. In addition to QAP 1270-14 above, QAP 1270-5, Revision 9, "Required Tests of Modification," Paragraph 2.a, stated that "Modification test requirements . . . will normally be specified by the designer of the modification . . ." and QAP 1270-17, Revision 3, "Minor Design Change Procedure," Paragraph C.8, stated that "The Cognizant Engineer will ensure that the tests . . . will meet or exceed . . . the acceptance testing checklist." For the check valve work, which was a minor design change, the mechanical test portion was marked as applicable. However, each of the 59 line items for the mechanical test was marked as not applicable (e.g., line items for check valve leakage). Technical staff engineers stated that there was probably no practical way to seat leak test these valves, although no other means of seat integrity verification was considered. Resolution of post-modification testing responsibilities was an open item pending a written response from the licensee.

RESPONSE:

It is the technical staff engineer's responsibility to determine the level of modification testing required to fully test modifications. Testing requirements specified by the design engineering organization are to be considered as minimum testing requirements. Additional testing requirements necessary to fully test a modification are identified by the technical staff engineer. The responsibilities of the technical staff engineer with regard to specify modification testing requirements was reemphasized during a department meeting held on July 22, 1992.

Additionally, an investigation into the reason for uncertainty of responsibility of the system engineers will be conducted. The results of this investigation and identification of any required corrective actions will be provided to the Resident Inspectors by October 31, 1992.