



**Commonwealth Edison**  
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September 21, 1984

Mr. James G. Keppler  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Quad Cities Station Units 1 and 2  
Response to Inspection Report  
Nos. 50-254/84-11 and 50-265/84-10  
NRC Docket Nos. 50-254 and 50-265

Reference (a): W. D. Shafer letter to Cordell Reed  
dated August 20, 1984.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. A. L. Madison, A. D. Morrongiello and J. C. Bjorgen on June 24 thru August 5, 1984, of activities at Quad Cities Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

D. L. Farrar  
Director of Nuclear Licensing

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Attachment

SEP 26 1984

cc: NRC Resident Inspector - Quad Cities

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## ATTACHMENT A

### COMMONWEALTH EDISON COMPANY RESPONSE TO NOTICE OF VIOLATION

As a result of the inspection conducted from June 24 through August 5, 1984 at Quad Cities Station, the following violations were identified:

#### ITEM OF NONCOMPLIANCE

1. 10 CFR 50, Appendix B, Section XII, as implemented by Commonwealth Edison Topical Report CE-1-A and Quality Assurance Procedure 12-51 Revision 5, requires instruments that are utilized in activities affecting quality to be properly calibrated and adjusted at specified periods to maintain accuracy within necessary limits. Section II explains that such activities of the quality assurance program shall be accomplished to an extent consistent with the component's importance to safety.

Contrary to the above, two safety related pressure switches which provide for fail-safe damper operation upon loss of instrument air pressure were found on July 3, 1984, by the resident inspectors to not have been calibrated since 1978 as a result of not being on the safety related calibration list. The pressure switches are associated with the inlet dampers of the Standby Gas Treatment System. Subsequently, the licensee identified eight more pressure switches associated with reactor building ventilation isolation valves that had not been placed on the safety related calibration list and for which no calibration data could be found other than original installation records.

#### CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

Besides accounting for the eight reactor building ventilation pressure switches and the two Standby Gas Treatment System pressure switches, the Quad Cities Station has reviewed all safety related valves which have a fail-safe function. This review addressed whether or not an adequate calibration and/or testing program existed. There were no additional instruments identified as needing to be added to a periodic calibration list as a result of this review.

Quad Cities Station also included its investigation of this event, a review of all instrumentation used for surveillance of Safety-Related Systems. This review resulted in identification of additional instruments to be added to a schedule for periodic calibration.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

The instruments identified as requiring periodic calibration will be added to the Instrument List and calibrated by October 31, 1984.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by October 31, 1984, when the above procedure revisions will be implemented.

ITEM OF NONCOMPLIANCE

2. 10 CFR 50, Appendix R, Paragraph M states that penetration seal designs shall utilize only noncombustible materials and shall be qualified by tests that are comparable to tests used to rate fire barriers.

Contrary to the above, one penetration was found by the resident inspectors to contain material that was not qualified by tests comparable to tests used to rate fire barriers.

DISCUSSION

The air hose was installed temporarily to support contractor work in the area. At the time of this violation, an analysis of the temporary penetration was requested from Professional Loss Control Inc., Fire Protection Consultants. Their analysis stated:

"The subject penetration was a 1/2 inch O.D. air hose penetrating a sealed 3" conduit in the Cable Spreading Room. The 3" conduit void space was sealed with mineral fiber and RTV (silicon) foam. The conduit was adequately sealed. The only question is whether the 1/2 inch air hose of EPR would behave similar to a 1/2 inch cable. Most likely the mineral fiber and the charring silicon foam would have expanded to seal off the 1/2 inch hole in the event of a fire similar to the way the seal around melting cable insulation. Although this configuration has not been tested, it is our opinion that the small penetration as described did not violate the fire barrier or significantly degrade the seal."

"In the future, to remove any doubt when similar breaches are required, we recommend resealing the opening with 1" of 3M Brand Fire Barrier caulk CP25. This material will intumesce and expand to fill the opening left by the melting hose. This caulk has been tested and approved for a 3 hour fire rating."

Commonwealth Edison concurs with their analysis.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

The air hose was removed and the opening resealed with 3M caulk.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

To prevent recurrence, Commonwealth Edison's Station Nuclear Engineering Department has been requested to provide recommendations and criteria so that the Station can develop a method for sealing temporary penetrations based on approved fire protection practices. Procedures will be prepared and implemented for this purpose.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance is achieved at this time, as temporary fire barrier penetrations are currently not in use at the Station. Prior to the use of any future temporary barriers, Quad Cities will develop procedures based on recommendations received from Station Nuclear Engineering.

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