



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

DmB

May 8, 1985

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.
50-254/85-007 and 50-265/85-007
NRC Docket Nos. 50-254 and 50-265

Reference (a): W. D. Shafer letter to Cordell Reed
dated April 10, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. A. L. Madison and A. D. Morrongiello on February 24 thru April 1, 1985 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

lm

Attachment

cc: NRC Resident Inspector - Quad Cities

MAY 10 1985

0027K

8506100241 850508
PDR ADOCK 05000254
G PDR

11
IE01

ATTACHMENT

COMMONWEALTH EDISON COMPANY
RESPONSE TO NOTICE OF VIOLATION

Item of Non-compliance

10 CFR 50.72 (G)(2)(ii) requires that any event that results in manual or automatic actuation of any Engineered Safety Feature, including the Reactor Protection System, be reported to NRC within four hours.

Contrary to the above, while in a Refueling Outage, Unit 2 scrambled at 1515 hrs. on March 28, 1985, and this scram was not reported to the NRC within the required time frame of four hours.

Discussion

On March 28, 1985, Unit Two was shutdown for the End of Cycle Seven Refueling and Maintenance Outage. At 1515 hours a Reactor scram signal was initiated from a Main Steam Line High Radiation signal. An investigation revealed that the scram was caused by radiography being performed in the vicinity of the Main Steam Line Radiation detectors. The scram was considered "pre-planned" because the Shift Engineer had been given prior notification that radiography was about to be performed in the MSIV room.

On March 29, 1985, the scram of the previous day was discussed with the NRC Resident Inspector. At this time, the Resident Inspector informed the Station that a formal procedure was necessary for the scram to be considered as a "pre-planned sequence of events". The NRC must be notified within 4 hours of any scram which is not a "pre-planned sequence".

Corrective Actions Taken and Results Achieved

On March 29, 1985, at 0921 hours, the NRC was notified using the Emergency Notification System of the scram the previous day.

Corrective Action Taken to Avoid Further Noncompliance

In order to prevent reoccurrences of this type, an administrative procedure was immediately put into effect in the form of temporary procedure 2470. This procedure has since been superceded by a permanent procedure, QAP 900-5 "In-Plant Radiography -- Required Notifications and Actions." The new procedure documents the actions to be taken by the radiographer, Shift Engineer and Radiation Protection Foreman prior to radiographic operations in the plant.

Date When Full Compliance Will be Achieved

The Station is currently in full compliance.