

Commonwealth Edison Company
Quad Cities Generating Station
22710 206th Avenue North
Cordova, IL 61242-9740
Tel 309-654-2241



ESK 96-205

November 5, 1996

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

Attention: Document Control Desk

Subject: Quad Cities Station Units 1 and 2;
NRC Docket Numbers 50-254 and 50-265;
NRC Inspection Report Numbers 50-254/96011 and 50-265/96011.


Reference: G. E. Grant Letter to E. S. Kraft, Jr., Dated October 10, 1996,
Transmitting Notice of Violation.

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violation (NOV) transmitted with the referenced letter. The report cited a Severity Level IV violation concerning three examples of failure to adhere to work procedures.

This letter contains no new commitments.

If there are any questions or comments concerning this letter, please refer them to Mr. Charles Peterson, Regulatory Affairs Manager, at (309) 654-2241, extension 3602.

Respectfully,


E. S. Kraft, Jr.
Site Vice President

Attachment (A), Response to Notice of Violation

cc: A. Beach, NRC Regional Administrator, RIII
R. Pulsifer, NRC Project Manager, NRR
C. Miller, Senior Resident Inspector, Quad Cities
D. C. Tubbs, MidAmerican Energy Company
R. Singer, MidAmerican Energy Company
F. Spangenberg, Regulatory Affairs Manager, Dresden
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ATTACHMENT A
Response To Notice of Violation
(Page 1 of 3)

STATEMENT OF VIOLATION (254/265-96-011-04):

NOTICE OF VIOLATION

During an NRC inspection conducted on July 13 through August 22, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violation is listed below:

Technical Specification 6.2.A.1 requires, in part, that written procedures involving nuclear safety be adhered to.

Licensee procedure QCAP 306-00, Rev. 8, "Work Execution," Step D.9 required work be performed as indicated by the work instructions.

- Work Package #950084164 required workers replace the oiler on the shared emergency diesel generator cooling water pump (EDGCWP).
- Work Package #960066169-08 provided instructions for rewiring the Unit 1, LPCI "A" train, outboard isolation valve power supply breaker per Engineering details, and specified that quality control inspectors were to verify that the wiring was correct.
- Work Package #960015193-04, at Step 23, required removal of seal centering clips and tightening of collar set screws.

Contrary to the above,

- a. On July 10, a worker using Work Package #950084164 replaced the oiler on the Unit 2 EDGCWP.
- b. On July 29, it was discovered that workers using Work Package #960066169-08 had miswired the LPCI outboard isolation valve power supply breaker, and that quality control inspectors had incorrectly verified that the wires were installed in accordance with the instructions.
- c. On May 28, workers using Work Package #960015193-04 neither removed the seal centering clips nor tightened the collar set screws during maintenance on the 2C RHRSW pump.

ATTACHMENT A
Response To Notice of Violation
(Page 2 of 3)

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

REASON FOR VIOLATION:

Quad Cities Station acknowledges the violation. These violations occurred due to personnel performance errors by the workers and the first line supervisors involved. The following are the specifics on each example described above:

Example a:

The worker and the first line supervisor exhibited inattention to detail by going to the wrong Diesel Generator Cooling Water Pump. Once they arrived at the wrong pump, an incorrect label contributed to this event. The first line supervisor realized his error and stopped the job.

Example b:

The work package and the design drawing did not designate a specific terminal point. The wiring at each relay coil was swapped in reference to the "as-built" design drawings. This resulted in a short across the secondary winding of the control transformer when the control switch for the valve was taken to the open position during testing. Consequently, the control transformer failed due to the short across the secondary winding.

Example c:

The first line supervisor was negligent in the performance of his duties. The first line supervisor signed off work steps as completed that had not yet been performed.

CORRECTIVE ACTIONS TAKEN:

Example a:

- 1) The proper oil setting and level was verified on the U2 Diesel Generator Cooling Water Pump.
- 2) The first line supervisor was counselled on his inattention to detail and a copy of the completed Problem Identification Form was placed in his personnel file.
- 3) The incorrect label was replaced and all other labels around the Diesel Generator Cooling Water Pumps were verified to be correct.

ATTACHMENT A
Response To Notice of Violation
(Page 3 of 3)

Example b:

- 1) The work package was revised to replace the failed control transformer and correct the wiring so that it matched the design change drawings.
- 2) The electrician and QC inspector involved in the event were counselled on a personal level.
- 3) The analysts have been instructed that when providing specific point by point terminations in the work package and the electrical drawing does not provide a specific termination point an Engineering Request will be written to resolve the issue. This has been added to the analyst training.

Example c:

- 1) The component specialist inspected the pump and no indication of damage or leakage was found.
- 2) The first line supervisor was disciplined for unacceptable performance.
- 3) A review was performed of all of the work packages completed by the first line supervisor in the previous month and no recurrences of this nature were found.

ACTIONS TO PREVENT FURTHER OCCURRENCE:

All of these events have been discussed with the appropriate organizations and management's expectations of procedural adherence and attention to detail have been reinforced.

Self-check training has been added to the annual training for maintenance and On-the-Job-Evaluations (OJE's) and On-the-Job-Training (OJT's) have been changed to include self-check.

DATE WHEN FULL COMPLIANCE WILL BE MET:

All actions associated with these events have been completed.