



Commonwealth Edison

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Address Reply to: Post Office Box 767

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August 23, 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.
50-254/85-010 and 50-265/85-011
NRC Docket Nos. 50-254 and 50-265

Reference (a): Letter from C. J. Paperiello to Cordell
Reed dated July 25, 1985

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. G. Brown and J. Patterson of your staff on June 24-28, 1985, of activities at Quad Cities Station. The referenced letter 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. This response also addresses your concern identified in the referenced cover letter regarding the effectiveness of our GSEP training program.

Very truly yours,

for M.S. Turbak
L. O. DelGeorge
Assistant Vice President

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Attachment

cc: NRC Resident Inspector - Quad Cities

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COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

As a result of the inspection conducted from June 24 thru June 28, 1985, at Quad-Cities Station, the following violation was identified:

Item of Violation

1. 10 CFR 50.54(q) states in part that "A licensee authorized to possess and/or operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) to this Part." 10 CFR 50.47(b)(15) states in part that, "The onsite emergency response plans for nuclear power reactors must meet the following standards: Radiological emergency response training is provided to those who may be called on to assist in an emergency." Section 8.2 of the licensee's Generating Stations Emergency Plan states in part that "The proficiency of emergency personnel is ensured by the initial and annual retraining of emergency personnel on applicable generic and site portions of the GSEP and corresponding Emergency Plan Implementing Procedures."

Contrary to the above, a review of the licensee's training records determined that two individuals assigned to the Maintenance Directors staff listing had not received the required radiological emergency response training.

Corrective Actions Taken and Results Achieved

1. The two individuals identified in the subject item of violation have since received the required Maintenance Director training. This has been documented as a matter of Training Department records.
2. The inspectors expressed a concern that certain individuals that were interviewed displayed inadequate knowledge of Generating Station Emergency Plan objectives. This, for the most part, can be attributed to their inexperience while functioning in newly assigned Generating Station Emergency Plan positions. The individuals interviewed were, for the most part, individuals who have been newly added to GSEP positions. However, to greatly upgrade the level of knowledge of all participants, new lesson plans are being developed for each GSEP position and all directors, alternates and other individuals who are assigned functions in the GSEP (i.e., augmentation lists and callers) will receive this training.

Corrective Action To Be Taken To Avoid Further Non-Compliance

1. QEP 520-1 (GSEP Training Procedure) will be revised to completely re-define the scope and training requirements for GSEP participants at Quad-Cities Station.
2. The Training Supervisor will be added to the On-Site Review Committee for all revisions to the Generating Station Emergency Plan. The Training Supervisor will then ensure that all training requirements have been completed prior to authorizing any changes in GSEP positions.

Date When Full Compliance Will Be Achieved

1. Preliminary versions of the revised position specific GSEP lesson plans, developed and controlled by the Production Training Department, will be used in the 1985 GSEP training sessions during September. Experience gained in the initial use of these lesson plans will be factored into the final versions to be completed by October 31, 1985.
2. Position specific GSEP training for all Quad-Cities Directors and Alternates shall be completed by September 30, 1985.
3. QEP 520-1 will be revised and the Training Supervisor added to the GSEP On-Site Review Committee by September 30, 1985.

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