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ESK-97-107

May 16, 1997

United States Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention Document Control Desk

Subject: **Closure of the Quad Cities Course of Action**  
Docket Nos. 50-254 and 50-265

The purpose of this letter is to close the Quad Cities Course of Action (COA). The COA was issued in April 1994. It was developed for two purposes: (1) to identify the major issues that were responsible for the then identified trend of declining performance, and (2) to provide corresponding areas of action to address those issues. The COA provided not only a means for identifying and initiating relatively short term corrective actions to arrest and turn the trend of declining performance, but it also provided a framework for longer term continuous improvements beyond the intended three year life of the COA.

These objectives of the COA have been realized. It was recognized at the outset that the leap from Quad Cities' status in early 1994 to superior, industry leading performance by the end of 1996 was not a realistic goal. Rather, sustained improvements throughout the life of the COA and beyond, provided the most stable, and in the long term, most successful strategy for lasting improvement. Implementation of actions to deal with the issues identified in the COA, and other improvement actions, has been addressed through the action plans contained in the year-to-year Management Plans. In 1997 and into the future, these annual action plans, now called Quad Cities Operational Plans, will continue and will be used to extend our improvement efforts beyond the COA.

In 1995, 1996, and continuing in 1997, completion and closure of Management Plan action plans received reviews from senior management in the form of the Site Planning Group (SPG), chaired by the Station Manager, or from a specially selected subcommittee of the SPG, to review closure of action plans. Closure packages were formally presented by the individuals or managers responsible for the action plan. The packages were reviewed in detail as part of the closure process. When actions were not complete, or it was deemed that more could and should be done, action items were created and will be tracked in the future, in the station's Nuclear Tracking System (NTS). In this way, a safety net is created to ensure that incomplete or less than fully effective actions are not lost, but are carried forward to their intended conclusions, even if they are completed after closure of the COA. The closure packages will be maintained together in a central file which can be cross-referenced between their respective Management Plans and the COA. These files are available at the station for review.

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Periodic status reports on our progress against the COA were provided to the NRC in letters dated:

- December 23, 1994
- January 11, 1995 (supplement to the December 1994 report)
- May 1, 1995
- December 26, 1995
- March 12, 1996

These reports contained the full spectrum of effectiveness results from summaries of Quad Cities successes to candid descriptions of those issues in which actions were not complete, less effective than desired or needed, or not yet assessed for effectiveness. These reports also clearly demonstrated that when full effectiveness of an action is not realized, it continues to be pursued until the desired results are achieved. The final assessment of the success of the COA contains that same mix of results, with successes far outnumbering those issues that need additional efforts. We continue to build on the issues that have brought satisfactory results, and we continue to pursue pragmatically those areas where the desired results have not been achieved.

### Conclusion

The COA was not intended to be the end point for any of the issues. In fact, there are no issues or actions in the COA where we will ever be able to say that we are truly finished. The COA was designed for the purposes of focusing our attention on important issues in order to bring about substantive improvements, and to give a perspective on what must be pursued on a continuing basis. Those purposes have been well served. One of the disciplines instilled through the COA is the determination to go back as many times as necessary to keep working on those issues that do not lend themselves to relatively easy solution. As there have been many successes achieved through the COA, there are also a number of those issues which are taking repeated efforts to solve. We have not and will not lose sight of those issues. The most important of these ongoing issues include the following items:

- More time in the field for management is needed, especially for First Line Supervisors;
- Significant improvement is still needed in the efficient planning, scheduling, and execution of work;
- Radiation Worker practices still require substantial improvement;
- Root Cause Analysis sometimes produce results which fail to completely and effectively address corrective issues.

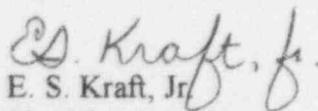
May 16, 1997

- Engineering is continuing to improve the allocation of resources and prioritization of work.
- Station cumulative dose for the work force is still too high;
- More timely actions are needed to assess Quad Cities against issues and findings at other ComEd Nuclear Stations;
- The quality of work and work practices in Maintenance needs additional significant improvement;
- There still exist too many Operator Work Arounds, Temporary Alterations, and posted Caution Cards, sometimes unnecessarily challenging operators.

Having served its purpose of guiding the station in bringing improvements and focusing us on still needed future improvements, the COA is now completed. We will pursue ongoing improvement efforts through the implementation of our annual Operational Plan, and other actions which will continue our efforts to improve performance at Quad Cities Station.

If you have any questions concerning this letter, please contact Mr. Charles Peterson, Regulatory Affairs Manager, at (309) 654-2241, extension 3609.

Respectfully,

  
E. S. Kraft, Jr.  
Site Vice President  
Quad Cities Station

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