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Dmr

March 26, 1986

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.
50-254/85-029 and 50-265/85-032
NRC Docket Nos. 50-254 and 50-265

Reference (a): Letter from N. J. Chrissotimos to
Cordell Reed dated February 28, 1986.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. A. L. Madison, A. D. Morrongiello, R. A. Hasse, W. G. Guldmond and Ms. M. J. Oestmann of your staff on December 7, 1985 through February 8, 1986, of certain activities at Quad Cities Station. The referenced letter indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company's response to the Notice of Violation is provided in the enclosure.

If you have any further questions regarding this matter, please contact this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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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 on January 23, 1986, at Quad-Cities Station, the following violation was identified:

Item of Violation

Technical Specification 3.8/4.8.A.1 states that representative samples of gaseous effluents shall be obtained in accordance with the sampling and analysis program specified in Table 4.8-1. Table 4.8-1 requires collection of monthly grab samples and analysis for tritium in gaseous effluents.

Contrary to the above, the licensee failed to collect a sufficient amount of sample material from Unit 2 during December 1985 to permit an adequate tritium analysis to be performed.

Discussion

Grab samples from the Reactor Building Vent Stack gaseous effluent for the purpose of tritium analyses are obtained by condensing water vapor from the gaseous effluent in a trap cooled by dry ice. Attempts were made in December 1985 to obtain the required samples from the Unit Two effluent, but the amount of material obtained was insufficient for analysis. Chemistry personnel then decided to use the value collected from the Unit One sample for Unit Two, based on the fact that Unit One has had consistently higher tritium activity than Unit Two. The missed sample was not discovered by Station management until January 1986, when difficulty in obtaining a sufficient amount of sample material was again experienced.

Corrective Action Taken And The Results Achieved

1. Upon discovery that a December 1985 sample had not been attained from the Unit Two Reactor Building Vent effluent for tritium analysis, the event was reported to the NRC in Unit Two Licensee Event Report 86-02 in accordance with the requirements of 10 CFR 50.73(a)(2)(i).
2. A sample was obtained from Unit Two in January 1986 when the missed sample was discovered. Analysis of that sample revealed the tritium activity to be in the normal range. Based on operating conditions and trends, there is no reason to assume that a large increase in the Unit Two Reactor Building Vent Stack effluent tritium activity would have occurred in December 1985. The December 1985 tritium activity value for Unit One will be used for the missing Unit Two value since a review of the Reactor Building Vent Stack effluent history has shown that Unit One has had consistently higher tritium activity than Unit Two.

Corrective Action To Be Taken To Avoid Further Violations

1. The Radiation/Chemistry Department Head talked with the chemists and stressed the need for good communications, and the importance of informing station management when a Technical Specification surveillance requirement may not be completed in the required interval.
2. A refrigerated condensation trap has been received and was successfully used to collect the tritium samples at the gaseous effluent points in March 1986. The use of a refrigerated condensation trap will allow the sample collection period to be as long as necessary to obtain a sufficient amount of sample material, and is not dependent on the quantity of dry ice on hand. Two additional units have been ordered so both sampling locations will have a system and one will be a spare.

Date When Full Compliance Will Be Achieved

The Station is currently in full compliance. The new refrigerated condensation trap is being used to obtain the Reactor Building Vent samples from both units until the other refrigerated traps arrive.