



**Commonwealth Edison**  
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January 4, 1988

Mr. A. Bert Davis  
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 I.E. Inspection Report  
Nos. 50-254/87031 and 50-265/87031  
NRC Docket Nos. 80-254 and 50-265

Reference (a): Letter from W. D. Shafer to Cordell Reed  
dated December 4, 1987

Dear Mr. Davis:

This letter is in response to the inspection conducted by your office during the period of November 2, 1987 through November 6, 1987, by Mr. T. J. Ploski and Ms. M. J. Smith of certain activities at Quad Cities Station. The referenced letter indicated that certain activities appeared to be in violation of NRC requirements. The Commonwealth Edison Company's response to the Notice of Violation is provided in Attachment A.

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

Very truly yours,

L. D. Butterfield  
Nuclear Licensing Manager

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Attachment

cc: W. D. Shafer - Region III  
NRC Resident Inspector - Quad Cities

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ATTACHMENT A

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

As a result of the inspection conducted on November 2-6, 1987 the following violations were identified:

ITEM OF VIOLATION

1. 10 CFR 50.72(b)(iv) states, in part, that: "If not reported as a declaration of an Emergency Class under Paragraph (a) of this section, the licensee shall notify the NRC as soon as practical and in all cases within one hour of the occurrence of any of the following:  
. . . (iv) Any event that results or should have resulted in Emergency Core Cooling system (ECCS) discharge into the reactor coolant system as a result of a valid signal."

Contrary to the above, at about 8:00 p.m. on October 19, 1987, the Unit 2 reactor automatically shut down from about 90 percent power. ECCS was initiated and began discharging into the reactor coolant system. However, the NRC was not notified of this situation, which the licensee initially analyzed as a 1-hour, non-emergency report until about 9:17 p.m., approximately 75 to 77 minutes after reactor shutdown and ECCS initiation.

This is a Severity Level IV violation.

DISCUSSION

License Event Report (LER) 265/87-013, Revision 00, provides details of this event. A brief description of the event scenario is provided below:

On October 9, 1987, Quad Cities Unit Two was in the RUN mode at approximately 90 percent of reactor thermal power. At 1959 hours, an Equipment Operator (EO) incorrectly attempted to rack out of service an energized 4 kV circuit breaker on Bus 23. As the breaker was withdrawn, the shutter in the breaker cubicle, which was lowered in the racking out process, came in close contact with the energized breaker stabs causing them to flash to ground. Bus 23 tripped on overcurrent. As a result, a reactor scram and Emergency Core Cooling System (ECCS) initiations and related actuations occurred at 2000 hours. Reactor water level dropped to approximately -60 inches but was quickly restored. A normal scram recovery then followed. NRC notification of this event was completed at 2117 hours.

### CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

As a result of this incident all SCRE's, Shift Engineers, and Operating Engineers have received documented "Immediate Notification Awareness" training. The scope of this training was the reporting rules of 10 CFR 50.72 and remedial training on emergency action levels. This training was completed on November 27, 1987. All Station Duty Officers will complete this training by January 16, 1988.

A new Emergency Planning position has been created in the Station Training Department. An ongoing training program will be developed to address aspects of Emergency Planning, i.e., Emergency Action Levels, event classification, and event notifications. All personnel having responsibilities in Emergency Planning will receive periodic training that should result in improved Station readiness.

### CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATIONS

The Senior Reactor Operator (SRO) requalification training program will address Emergency Notification System (ENS) requirements. ENS will become a specific item of instruction.

The Station is aware of the importance of prompt notification and is considering methods to improve the timeliness of notifications to the NRC and other agencies. One measure being taken will be a review of shift manning vs. responsibilities and a determination of the position best able to perform the initial notification.

### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The new Emergency Planning Training Program should be developed and all other corrective actions should be completed by April 4, 1988.

### ITEM OF VIOLATION

2. 10 CFR 50.54(q) states, in part, that "a licensee authorized to operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in Appendix E to this part. Section 8.5 of Revision 6/6A to the Generating Stations Emergency Plan (GSEP) states, in part, that the "names and phone numbers of the GSEP organization and support personnel shall be reviewed and updated at least quarterly." The word "quarterly" is interpreted as 92 days plus a grace period of 25 percent (23 days).

Contrary to the above, as of November 5, 1987, Revision 20 of procedure QEP 310-T3, Prioritized Notification Listing, used for callout of the onsite emergency organization was stamped as approved on June 24, 1987 and was to be effective for the period July through September 1987. This document was not reviewed and updated for a period of 134 days, thereby exceeding the quarterly review and updating requirement.

This is a Severity Level IV violation.

#### CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

QEP 310-T3 revision 22, Prioritized Notification Listing for the quarter January through March 31, 1988, was implemented on December 22, 1987. This implementation date meets quarterly review and updating requirements. To ensure that QEP 310-T3 continues to be reviewed and updated according to the proper quarterly schedule, this task will be tracked using the Nuclear Tracking System (NTS No. 2541008703106.1). The tracking system will provide a six week reminder for the GSEP Coordinator and the Procedure Coordinator of the upcoming revision due date for QEP 310-T3. The tracking system will be used until a Station procedure for tracking GSEP surveillance requirements has been implemented.

#### CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

A new procedure along with its associated checklists is being created to more effectively monitor GSEP surveillances. This new procedure will be QEP 560-1, Scheduling of Generating Station Emergency Plan Surveillance Requirements. The associated checklists will contain provisions for monitoring the following: due date, date performed, date previously performed, current interval, previous interval, next due date, and a verification signoff.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved when QEP 560-1 and its associated checklists have been implemented. These procedures will be implemented by January 31, 1988.