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Quad Cities Generating Station
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ComEd

ESK-97-136

June 26, 1997

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 50-254/97-002 and 50-265/97-002

Reference: (a) J. A. Grobe to E. S. Kraft, Jr. Letter dated April 25, 1997
(b) ESK Letter 97-111, dated May 27, 1997 to USNRC

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violation (NOV) 97-002-01 transmitted in reference (a). The NOV cited a Severity Level IV violation concerning operation of the 'B' Reactor Protection System with less than the required number of operating channels. Regarding this violation, the response to the violation was delayed 30 days per reference (b).

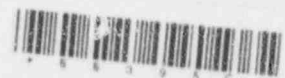
This letter contains the following commitments:

1. Operator training will be conducted in order to ensure all license holders understand the basis for the operability determinations made during this event and the subsequent application of the Technical Specification requirements.
(NTS # 254-100-97-00201.01)
2. A review will be performed to determine if a Technical Specification change to implement the Improved Technical Specification time limits associated with inoperable RPS instrumentation channels should be submitted.
(NTS # 254-100-97-00201.02)

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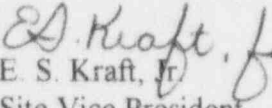
A Unicom Company



June 26, 1997

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 3609.

Respectfully,


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

Attachment (A) "Response to Notice of Violation"

cc: A. B. Beach, Regional Administrator, Region III
R. M. Pulsifer, Project Manager, NRR
C. G. Miller, Senior Resident Inspector, Quad Cities
W. D. Leech, MidAmerican Energy Company
D. C. Tubbs, MidAmerican Energy Company
F. A. Spangenberg, Regulatory Affairs Manager, Dresden
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M. E. Wagner, Licensing, ComEd

Attachment (A)
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Although no violation of Technical Specification requirements occurred during this event, there are lessons learned which warrant additional action. Operator training will be conducted in order to ensure that all license holders understand the basis for the operability determinations made during this event and the subsequent application of the Technical Specification requirements. This will include a discussion of the one hour time limit for inserting the channel trip following inoperability and the restrictions associated with the allowed reset time for performing required surveillances.

(NTS # 254-100-9700201.01)

A review will be performed to determine if a Technical Specification change to implement the Improved Technical Specification time limits associated with inoperable RPS instrumentation channels should be submitted. (NTS # 254-100-9700201.02)

Attachment (A)
"Response to Notice of Violation"
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NOTICE OF VIOLATION (50-254-97002-01)

Technical Specification (TS) 3.1.A requires that the reactor protection system (RPS) instrumentation channels shown in table 3.1.A-1 be operable. Table 3.1.A-1 provides the modes in which each channel is required to be operable. The TS action statement requires that, with the number of operable channel(s) less than required by the minimum channel(s) per trip system requirement for one trip system, place the inoperable channel(s) and/or that trip system in the tripped condition within one hour.

Contrary to the above, at 10:47 a.m. on March 7, 1997, while Unit 1 was in Mode 1, the B RPS trip system had less than the minimum operable instrumentation channels required by TS table 3.1.A-1 due to the failed 1-590-108D RPS relay. Between 12:35 p.m. and 12:49 p.m. on March 7, 1997, the B RPS trip system was taken out of the tripped condition although the relay had been inoperable for greater than one hour.

This is a Severity Level IV violation (Supplement I). (50-254-97002-01)

Quad Cities Station has reviewed the circumstances regarding this proposed violation and takes exception to it for the following reasons. The violation states that "the B RPS trip system had less than the minimum operable instrumentation channels required by TS table 3.1.A-1 due to the failed 1-590-108D RPS relay." Quad Cities UFSAR, section 6.0.1.6 states that the reactor protection system (RPS) monitors reactor operation and initiates a reactor trip upon detection of an unsafe condition that might cause damage to the reactor fuel resulting in the release of radioactive materials to the environment. The condition which was present during the event described in the proposed violation involved a spurious trip of the 108D relay. Subsequent testing of the relay, both pre and post reset, did not identify any potential problems which would have prevented the relay from tripping on a valid actuation signal. Therefore, the 108D relay was determined to be capable of fulfilling its specified safety function.

Since the 108D relay was capable of performing its specified safety function, all instrument channels associated with the 108D relay were capable of performing their specified safety functions of providing a reactor trip and were meeting the definition of OPERABLE according to the Technical Specifications. As a result, the 108D relay was not inoperable until the shift conservatively declared the relay inoperable at 1249 hours on March 7, 1997. Therefore, Unit One did not operate in a condition where there were less than the minimum operable instrumentation channels required by TS table 3.1.A-1 without a trip inserted, and no violation of Technical Specification requirements occurred.