Commonwealth Edison One First National Plaza, Chicago, Illinois Address, Reply to: Post Office Box 767 Chicago, Illinois 60690

November 20, 1978

TERA

Mr. James G. Keppler, Director Directorate of Inspection and Enforcement - Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137

> Subject: Quad-Cities Station Units 1 & 2 Response to IE Inspection Report Nos. 50-254/78-21 and 50-265/78-22 NRC Docket Nos. 50-254/265

Reference (a): G. Fiorelli letter to B. Lee, Jr. dated October 31, 1978

Dear Mr. Keppler:

The following is in response to an inspection conducted by Messrs. I. N. Jackiw, N. J. Chrissotimos and C. H. Brown on August 21-25, 31, September 1, 6-7, 13-14 and October 3-4, 1978 of activities at Quad-Cities Station Units 1 & 2. Reference (a) indicated that some activities appeared not to be in conformance with commitments to the Commission. Our response to this item is enclosed in the attachment to this letter.

Please address any additional questions on this matter to this office.

Very truly yours,

Reed

Assistant Vice-President

attachment

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Commonwealth Edison NRC Docket Nos. 50-254/265

DEVIATION

Contrary to the licensee's commitments made in CE-1-A Topical Report Revision 4 (March 10, 1978) to comply with the requirements of Appendix B to 10 CFR Part 50 and to follow the QA guidance provided by the NRC in Regulatory Guide 1.39, Revision 2; and other Regulatory Guides, and ANSI Standard N45.2.12, Draft 3, Revision 4, 2-74, the control procedures for housekeeping and control of transient flammable material appeared to be deficient as shown by the following examples and other items pointed out to the licensee representatives during the review:

- Excessive amounts of oil (new and used) stored without protection near vital cabling;
- 2. Smoking in vital areas, marked as No Smoking Area;
- 3. Welding areas set up near vital cabling.

Discussion

This item was brought up as a result of the in-plant tour conducted by the NRC Fire Protection Evaluation Team during their site visit. This was a non-routine inspection; and although a few areas were found where housekeeping was deficient, the majority of the areas of the facility were clean, and so adverse reactor safety conditions were present.

Corrective Action

The areas found to be in need of better housekeeping have been cleaned. The space between the control room panels has been cleaned up, as has the cable spreading room. Control of the non-smoking areas is being more closely monitored. Bulk drum oil storage has been discontinued in the reactor building where vital cabling exists. However, oil is being stored in smaller metal containers to facilitate proper maintenance of running equipment. Welding areas in the plant are set up sufficiently away from vital cabling, and procedure QMP 100-3, Fire Prevention for Welding and Cutting, provides adequate fire prevention control. Further, procedure QAP 200-13, Station Housekeeping Organization, is being revised so as to be more up-to-date and inclusive.