



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

October 1, 1987

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Quad Cities Units 1 and 2
Response to Inspection Report Nos.
50-254/87-011 and 50-265/87-011
NRC Docket Nos. 50-254 and 50-265

Reference: Letter from J. Harrison to Cordell Reed
dated September 1, 1987

Dear Mr. Davis:

The referenced letter documents the results of a special safety inspection conducted by Messr. A. Gautam and other NRC representatives on your office on June 8 through 28, 1987, of activities at Quad Cities Power Station Units 1 and 2.

During the course of that inspection, certain activities appeared to be in noncompliance with NRC requirements. Attachment A to this letter contains our response to the violation.

Commonwealth Edison plans on providing you with a another response by November 15, 1987 which would address the remaining potentially enforceable items in the inspection report. Although a response was not required for these remaining items by your staff, we will be transmitting this information in an attempt to close them out.

If there are any further questions regarding this matter, please contact this office.

Very truly yours,

~~John S. Turbak~~
Assistant Licensing Manager

CS

Attachment

cc: T. Ross - NRR
NRC Resident Inspector - Quad Cities

3660K

8801130407 871001
PDR ADOCK 05000254
Q DCD

OCT 2 1987

11
IEO1

ATTACHMENT A

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

As a result of the inspection conducted on June 8 through July 28, 1987, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1985), the following violations were identified:

1. 10 CFR 50.49, Paragraph (f) requires equipment important to safety to be qualified by testing and analysis.

Contrary to the above, the environmental qualification (EQ) files on AVCO solenoid valves did not contain adequate documentation to qualify these valves for excessive air leakage exhibited during the LOCA test, and for usage of the Super Parker O-Lube Lubricant. Subsequent to the finding the licensee procured qualification tests and performed additional evaluations to qualify the installed valves, however, the equipment was unqualified due to inadequate documentation past the EQ deadline of November 30, 1985. This is a Severity Level IV Violation.

Discussion

Rev 0 of the Target Rock/AVCO Safety Relief Valve (SRV) Equipment Qualification Binder was completed on July 6, 1984. The qualification was based on General Electric Co.'s Report No. 126-62 dated January 15, 1975. This report has shown that no significant air leakage occurred for radiation levels expected to be seen by the SRV during and after a postulated accident. With regard to the lubricant our report did not contain adequate documentation to establish qualification.

Corrective Action Taken and Results Achieved

The initial corrective action was to obtain additional documentation that established the qualification of the solenoid as well as the Parker Super-O-Lube Lubricant. Furthermore, we discussed the matter with the consultants that prepared the binder and re-confirmed that evidence of qualification has to be included in every equipment binder issued.

Corrective Action Taken To Avoid Further Violation

The equipment binder was revised and re-submitted to the NRC RIII for review.

Date when Full Compliance Will Be Achieved

Full compliance was achieved as of the date of issue of the new equipment binder which was June 22, 1987

ITEM OF VIOLATION

2. 10 CFR 50.49, Paragraph (j), states that a record of qualification, including documentation, must be maintained in an auditable form for the entire period during which the covered item is installed in the plant to permit verification that the equipment is qualified for its application and meets its performance requirements during an accident.

Contrary to the above, the environmental qualification files of BIW and OKONITE cables did not contain supporting information (such as test data, evidence of the test profile being maintained during the test, list and calibration of instruments) to permit verification that the equipment was qualified for its application. The license subsequently procured additional qualification documents to supplement their file, however, these files were not in an auditable form past the EQ deadline of November 30, 1985. This is a Severity Level IV Violation.

Discussion

For OKONITE cables, extensive supporting documentation was available in the EQ File but not in the binder at the station. With regard to the BIW cable file the information sought by the NRC was not present in the EQ file.

Corrective Action Taken and Results Achieved

The corrective action taken was to include the EQ file information in our OKONITE EQ Binder for station use. The BIW cable additional data was obtained from the vendor.

Corrective Action Taken to Avoid Further Violation

Additional data was submitted to the NRC Region III for review. Furthermore, this matter was discussed with the consultants that prepared the binders, and re-confirmed that evidence of qualification has to be included in every equipment binder issued.

Date When Full Compliance Will Be Achieved

Full compliance was achieved as of the date that the information was submitted to NRC Region III, on July 17, 1987.