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ESK-97-014

January 20, 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 50-254/96014
and 50-265/96014.

Reference: J. Grobe to E. S. Kraft, Jr. Letter dated
December 20, 1996

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violation (NOV) transmitted with the referenced letter. The report cited two Severity Level IV violations concerning (a) Two examples of failure to adhere to procedures and (b) Failure to train personnel for maintenance activities.

This letter contains the following commitments:

- 1) A discussion of the event in NOV 96-014-01a and the proper use of the plant posting procedure, QCAP 0217-02, will be reemphasized in Mods. and Lessons Learned training during the summer of 1997 for licensed and non-licensed operators.
- 2) Maintenance Department memorandum 800-01, "Maintenance Department Qualification Program", will be revised to clarify the need for supervisory oversight when work is being performed by a technician who has not been qualified through the station's training program.

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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, NRC Regional Administrator, RIII
R. M. Pulsifer, NRC Project Manager, NRR
C. G. Miller, Senior Resident Inspector, Quad Cities
D. C. Tubbs, MidAmerican Energy Company
R. J. Singer, MidAmerican Energy Company
F. A. Spangenberg, Regulatory Affairs Manager, Dresden
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ATTACHMENT A (Page 1 of 6)
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STATEMENT OF VIOLATION (NRC IR 96-014-01a):

NOTICE OF VIOLATION

1. Technical Specification 6.8.A required applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be implemented. This regulatory guide included administrative procedures dealing with procedure adherence and maintenance procedures dealing with safety-related equipment.
 - a. Quad Cities Administrative Procedure (QCAP) 217-2, "Plant Posting Control," Revision 0, Step D.4.b, required in-plant postings to be reviewed and signed by the Shift Engineer.

Contrary to the above,

- a. A pressure-temperature limit graph from Procedure QCOS 0201-02, "Primary System Boundary Thermal Limitations," Revision 5, was found posted in the control room on October 11, 1996, which did not have the approval signature of a shift engineer.

This is a Severity Level IV violation (Supplement 1).
(50-254/265-96014-01(DRP))

REASON FOR VIOLATION:

Quad Cities Station acknowledges the violation for having a plant posting taped to a Unit 1 control room back panel on October 11, 1996, without the approval of the Shift Engineer. The cause of the event was a personnel error when a licensed operator failed to follow the approved plant posting control procedure.

ACTIONS TAKEN:

The Unit Supervisor determined that the posting had not been properly approved and removed the unauthorized copy of QCOS 0201-02 Attachment C from the control room back panel.

ACTIONS TO PREVENT FURTHER OCCURRENCE:

A write-up of this event and a summary of the plant posting procedure, QCAP 0217-02, has been included in required reading for licensed and non-licensed operators.

A discussion of this event and the proper use of the plant posting procedure, QCAP 0217-02, will be reemphasized in Mods. and Lessons Learned Training during the summer of 1997 (Training Request number 97-71 for licensed operators and Training Request number 97-72 for non-licensed operators).

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DATE WHEN FULL COMPLIANCE WILL BE MET:

Full compliance was met on October 11, 1996, when the Unit Supervisor removed the unauthorized copy of QCOS 0201-02 Attachment C from the control room back panel.

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STATEMENT OF VIOLATION (NRC IR 96-014-01b):

NOTICE OF VIOLATION

1. Technical Specification 6.8.A required applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be implemented. This regulatory guide included administrative procedures dealing with procedure adherence and maintenance procedures dealing with safety-related equipment.
 - b. Procedure QCAP 1100-12, "Procedure Use and Adherence," Step D.4.d.(5) required: "Following procedural steps in sequence unless deviations are allowed by procedure."

Quad Cities Mechanical Maintenance Surveillance (QCMMS) 6600-03, "Emergency Diesel Generator Periodic Preventive Maintenance Inspection", Steps G.1 and I.2 allowed portions of the procedure to be performed out of sequence at the discretion of the supervisors involved.

Contrary to the above,

- b. On October 23, 1996, procedure QCMMS 6600-03, Step I.12.h was performed before Steps I.12.f and g. without authorization of the supervisor involved.

This is a Severity Level IV violation (Supplement 1).
(50-254/265-96014-01(DRP))

REASON FOR VIOLATION:

Quad Cities Station acknowledges the violation for performing steps of maintenance procedure QCMMS 6600-03 out of sequence. Per the procedure, it is allowable to perform steps out of sequence or concurrently at the discretion of the job supervisor. However, in this case, the technicians performed sub-steps of the procedure out of sequence without the authorization of the job supervisor. The cause of the event was misinterpretation by the technicians of the requirements regarding supervisor approval to deviate from the sequence established in the procedure.

ACTIONS TAKEN:

- 1) This event was discussed with the maintenance groups to ensure expectations regarding documentation and approvals for conducting steps simultaneously or out of sequence were clearly communicated.
- 2) The station's work execution procedure QCAP 0306-00, was revised to require that supervisors document in the work package all steps of the work instructions that may be performed out of sequence or concurrently.

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ACTIONS TO PREVENT FURTHER OCCURRENCE:

No additional actions are required to prevent further occurrence. The actions taken above should prevent further occurrences.

DATE WHEN FULL COMPLIANCE WILL BE MET:

Full compliance was met on: October 30, 1996, with the completion of the above actions.

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STATEMENT OF VIOLATION (NRC IR 96-014-03):

NOTICE OF VIOLATION

3. Appendix B of 10 CFR Part 50, Criterion II, "Quality Assurance Program," requires the licensee's quality assurance program to provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.

Contrary to the above,

3. The licensee failed to ensure maintenance technicians performing activities affecting quality on the shared standby diesel generator on October 22, 1996, were trained to assure suitable proficiency.

This is a Severity Level IV violation (Supplement 1).
(50-254/265-96014-03(DRP))

REASON FOR VIOLATION:

Quad Cities Station acknowledges the violation for performing work on the shared standby diesel generator with technicians who were not qualified per the station's training program or technicians with oversight by a qualified supervisor. Quad Cities Station's "Maintenance Department Qualification Program," Maintenance Memorandum 800-01, dated February 28, 1996, allows a technician, who has not been qualified through the station's training program, to perform a task if an OEM technical service representative is assigned to support the employee. The supervisor on the midnight shift of October 22, 1996, interpreted this statement to mean that work could be performed on the shared diesel generator as long as a technical service representative was present. The supervisor further reasoned that the technical service representative could perform oversight of all three technicians working on the shared diesel generator since all three technicians working were in close proximity of each other. The cause of the event was due to the station's failure to ensure adequate supervisory oversight of all three technicians who had not been qualified through the station's training program.

In addition, Quad Cities Station acknowledges that it failed to verify the qualifications of the technical service representative, prior to performing work on the standby diesel generator. The cause of the failure to verify the technical service representative's qualifications was due to not having a procedure or policy governing responsibility and accountability for the control of on-site contracted services.

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ACTIONS TAKEN:

- 1) The vendor was contacted and provided certification of the technical service representative's qualifications. The technical service representative was qualified to perform the work in question.
- 2) The station implemented procedure QCAP 0307-27, "Control of On-Site Services," on December 2, 1996. The purpose of this procedure is to assure adequate control of contracted services provided by the companies not permanently assigned to Quad Cities. Members of Quad Cities Station's maintenance department management have been trained on this new procedure.

ACTIONS TO PREVENT FURTHER OCCURRENCE:

Maintenance Department memorandum 800-01, "Maintenance Department Qualification Program," will be revised to clarify the need for supervisory oversight when work is being performed by a technician who has not been qualified through the station's training program. (NTS 254-100-96-01403.01, Due February 20, 1997).

DATE WHEN FULL COMPLIANCE WILL BE MET:

Full compliance will be met on February 20, 1997, with the revision of Maintenance Department Memorandum 800-01 and training of the maintenance department supervisors on the revision.