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August 1, 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 Inspection Report Nos.
50-254/88016 and 50-265/88016"
NRC Docket Nos. 50-254 and 50-265

Reference (a): Letter from H.J. Miller to Cordell Reed
dated July 1, 1988.

Dear Mr. Davis:

This letter is in response to the inspection conducted by Mr. R. Mendez of your staff during the period June 7, through June 15, 1988 of certain activities at Quad Cities Station. The referenced letter indicated that certain activities appeared to be in noncompliance with NRC requirements and required a written response. 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 direct them to this office.

Very truly yours,

for H. E. Bliss
H. E. Bliss
Nuclear Licensing Manager

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Attachment A: Response to Notice of Violation

cc: 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 June 7-15, 1988, the following violation was identified:

ITEM OF VIOLATION:

10 CFR Part 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Quality Assurance Manual, states that activities affecting quality shall be prescribed by documented procedures or instructions and shall be accomplished in accordance with those procedures or instructions. Quad Cities Equipment Out-of-Service Procedure QAP 300-14 requires that all safety related equipment out-of-services and temporary lifts shall be independently field verified. Contrary to the above, on June 12, 1988, the operator in charge of performing the temporary lift on the 2A Containment Atmospheric Monitoring (CAM) Post-Accident H₂/O₂ system did not field verify the status of the monitors. Consequently, the monitor which was disconnected caused the drywell to leak excessively into the Reactor Building prior to the start of the integrated leak rate test.

This is a Severity Level IV.

DISCUSSION:

On June 12, 1988, at 1200 hours, Unit Two was in the SHUTDOWN mode at zero percent thermal power. Technical Staff Personnel were performing QTS 150-1 (Integrated Primary Containment Leak Rate Test). While performing the surveillance, test instrumentation indicated a leakage of approximately 1.3 wt %/day. Efforts at this time were made to locate the source of leakage. On June 13, 1988, at 0225 hours, the leakage path was identified to be a Containment Atmospheric Monitoring (CAM) 1/4 inch line (which had its isolation valve (2-2499-20A) temporarily lifted and opened to satisfy the requirements of the Containment Leak Rate Test procedure).

The 2A CAM is located in a locked cabinet on the north wall of the Unit Two Reactor Building. The 2-2499-20A valve is located approximately one foot above the locked cabinet. The temporary lift involved opening the 2-2499-20A so that the Containment Leak Rate Test valve lineup could be satisfied. The field verification of the temporary lift only involved verifying the valve position. Field verification is defined in QAP 300-14 as "...a first-hand check of valve positions..."

The problem was as a result of inadequate communication of system status when the temporary lift required for the Containment Leak Rate Test was requested and granted. This resulted in the opening of a leakage path from the drywell to the Reactor Building.

CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED:

The immediate corrective action taken was to issue Temporary Procedure No. 5547. Per the temporary procedure, valve 2-2499-20A was closed and a penalty for not venting the penetration was assessed. The Integrated Leak Rate Test began at approximately 0405 hours. A six-hour short duration BN-TOP-1, Revision 1, was successfully completed on June 13, 1988.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER ACTIONS:

In an effort to prevent recurrence, the following corrections are to be taken:

- 1) Quad Cities Procedure, QAP 300-14 (Equipment Out-of-Service) will be revised to provide enhancements to the process of temporary lifting equipment to service. A checklist will be developed to identify why the temporary lift is needed, and will document that the equipment status has been formally evaluated to assure proper equipment configuration for that purpose;
- 2) This violation and the Commonwealth Edison response to the Notice of Violation will be included in both Licensed Operator and Non-Licensed Operator required reading material;
- 3) This event will be discussed at Operating, Maintenance, and Technical Staff weekly tailgate meetings and will include a description of the new checklist described in item number 1 above;
- 4) A valve discrepancy checklist for the Integrated Leak Rate Test will be developed to ensure a potential leak path may not be opened due to a temporary lift. The procedure will require the test director or his designee to verify system integrity prior to the temporary lifting of a valve.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Item number 1 will be completed by October 31, 1988.

Item number 2 will be completed by October 31, 1988.

Item number 3 will be completed by November 30, 1988.

Item number 4 will be completed prior to the next IPCLRT scheduled for Unit 1 in the summer of 1989.