



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690 - 0767

July 22, 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 IE Inspection Report  
Nos. 50-254/88013 and 50-265/83013  
NRC Docket Nos. 50-254 and 50-265

Reference (a): Letter from W.D. Shafer to Cordell Reed  
dated June 15, 1988.

Dear Mr. Davis:

This letter is in response to the inspection conducted by your staff during the period May 10 through May 20, 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.

In a telephone conversation between Ms. I.M. Johnson of my staff and your Mr. B. Gregor, a seven (7) day extension for responding to this noncompliance was sought and obtained. The Commonwealth Edison Company's response to the Notice of Violation is provided in Attachment A.

If you have any questions regarding this matter, please contact this office.

Very truly yours,

H. E. Bliss  
Nuclear Licensing Manager

lm

Attachment A

cc: NRC Resident Inspector - Quad Cities

8808160430 880722  
PDR ADOCK 05000254  
Q PDC

4872K

JUL 25 1988

ATTACHMENT A

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

As a result of the inspection conducted on May 10-20, 1988, the following violation was identified:

ITEM OF VIOLATION

Technical Specification 6.2.B. requires that radiation control procedures be maintained, made available to all station personnel, and adhere to.

- a. Quad Cities Radiation Protection Procedure QRP 1000-1 requires each individual to read, understand and sign the Radiation Work Permit (RWP) and comply with its requirements in all respects.

Contrary to the above, on October 28, 1987, and May 17, 1988, two licensee workers failed to comply with RWP protective clothing requirements while working on underwater camera equipment removed from the fuel pool and reactor cavity, respectively, in that RWP required full-face masks were not worn. One worker handling the equipment was externally contaminated and another was both externally and internally contaminated.

- b. Quad Cities Radiation Protection Procedure QRP 1000-1 requires that the Rad/Chem Department be informed and/or consulted before the fact so that a radiological evaluation can be made when uncovering contaminated materials or disassembling potentially contaminated equipment where dose rates or airborne radioactivity may be expected to increase significantly.

Contrary to the above, on October 25, 1987, the Rad/Chem Department was not informed or consulted prior to uncovering (unbagging) contaminated camera equipment and subsequently disassembling portions of it.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The immediate Corrective Action taken at the time of the May 1988 event included making the RWP's governing work with underwater cameras more explicit. The tasks and the associated protective clothing requirements were broken down into more detail, resulting in less confusion. Additionally, these events, along with RWP awareness, were discussed with Electrical Maintenance personnel in their weekly tailgate safety meeting. These corrective actions resulted in no RWP violations by Electrical Maintenance personnel working on underwater cameras during the remainder of the outage.

CORRECTIVE ACTIONS TO BE TAKEN IN ORDER TO AVOID FURTHER VIOLATIONS

A review of the two events indicate that the root cause of the contamination occurrences and subsequent Radiation Occurrence Report, was the failure to follow radiological protection instructions on the RWP. A contributing factor was the complexity of the RWP and the apparent confusion regarding the proper handling of contaminated materials. To address these issues, the following steps will be undertaken:

1. The responsibility for adherence to the requirements of the RWP rest with each individual. This includes responsibility for understanding the entire contents of the RWP. The station will re-emphasize that the responsibility for strict adherence to the RWP program lies with all individuals at the station. Additionally, the need for individuals to contact the Radiation Protection Department in the event that radiological conditions have changed or are suspected to have changed will be re-emphasized. This instruction will be incorporated in the Station Annual Retraining in 1988.
2. A review of the existing RWP's will be conducted in order to identify any deficiencies, including excessive detail, lack of specific guidance or redundancy. Lessons learned as a result of this process will be incorporated into the appropriate guidance to ensure future RWP's are accurately written.
3. As part of the Radiation Occurrence Report Investigation, a committee was formed to look at the broader issue of control of small radioactive material containments. The committee recommendations have been reviewed by station management and will be incorporated into station procedures as appropriate.

Specific controls that will be taken include: requiring Radiation Protection notification prior to opening any bags, gang boxes, etc. containing tools or equipment used in the fuel pools or reactor cavities. In addition, the Radiation Work Permit will require Radiation Protection to label all such small containments, which contain highly smearable items, with the caution to notify Radiation Protection prior to opening. Radiation Protection will develop specific criteria on such labeling as required.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The specific procedure revisions will be completed by October 1, 1988. The R.W.P. system will reflect these specific procedure revisions by January 1, 1989. The training will be completed by October 1988.

CORRECTIVE ACTIONS TO BE TAKEN IN ORDER TO AVOID FURTHER VIOLATIONS

A review of the two events indicate that the root cause of the contamination occurrences and subsequent Radiation Occurrence Report, was the failure to follow radiological protection instructions on the RWP. A contributing factor was the complexity of the RWP and the apparent confusion regarding the proper handling of contaminated materials. To address these issues, the following steps will be undertaken:

1. The responsibility for adherence to the requirements of the RWP rest with each individual. This includes responsibility for understanding the entire contents of the RWP. The station will re-emphasize that the responsibility for strict adherence to the RWP program lies with all individuals at the station. Additionally, the need for individuals to contact the Radiation Protection Department in the event that radiological conditions have changed or are suspected to have changed will be re-emphasized. This instruction will be incorporated in the Station Annual Retraining in 1988.
2. A review of the existing RWP's will be conducted in order to identify any deficiencies, including excessive detail, lack of specific guidance or redundancy. Lessons learned as a result of this process will be incorporated into the appropriate guidance to ensure future RWP's are accurately written.
3. As part of the Radiation Occurrence Report Investigation, a committee was formed to look at the broader issue of control of small radioactive material containments. The committee recommendations have been reviewed by station management and will be incorporated into station procedures as appropriate.

Specific controls that will be taken include: requiring Radiation Protection notification prior to opening any bags, gang boxes, etc. containing tools or equipment used in the fuel pools or reactor cavities. In addition, the Radiation Work Permit will require Radiation Protection to label all such small containments, which contain highly smearable items, with the caution to notify Radiation Protection prior to opening. Radiation Protection will develop specific criteria on such labeling as required.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The specific procedure revisions will be completed by October 1, 1988. The R.W.P. system will reflect these specific procedure revisions by January 1, 1989. The training will be completed by October 1988.