

September 15, 1988

Docket Nos. 50-254; 50-265
Licenses No. DPR-29; DPR-30
EA 88-161

Commonwealth Edison Company
ATTN: Mr. James J. O'Conner
President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTIES
(NRC INSPECTION REPORT NOS. 50-254/88011(DRS) AND 50-265/88012(DRS))

This refers to the inspection conducted on April 18-22, May 2-6, 11, 31 and June 1, 1988, at the Quad Cities Nuclear Power Plant, Units 1 and 2, Cordova, Illinois. Violations of NRC requirements were identified as a result of this inspection. The referenced inspection report was sent to you by letter dated June 22, 1988. An enforcement conference was conducted in the Region III office on June 24, 1988, with Messrs. D. Gall, L. DelGeorge, N. Kalivianakis and others of your staff, and myself and others of the NRC Region III staff.

Two significant violations were identified during this inspection and are included as part of the enclosed Notice of Violation and Proposed Imposition of Civil Penalties (Notice).

Violation I.A involves the continued operation of Unit 2 for approximately six months while the 1/2 Emergency Diesel Generator was incapable of automatically performing its intended safety function due to an undetected failure in the circuitry of the automatic start relay (ASR). Violation I.B involves the failure to perform a safety evaluation for various grounds which existed on the ESS DIV 1 125 volt battery system. Those grounds could have resulted in spurious operation or non-operation of 125 Vdc safety circuits.

The violations occurred and continued as a result of poor performance in several areas: 1) the drawing error noted by the electrical maintenance department was not corrected in plant drawings for almost nine months; 2) once the design changes were incorporated, no apparent attempt was made to review the work that had been performed ten days earlier; 3) post modification tests gave indications of circuit anomalies that were not properly resolved; and 4) operators did not investigate changes in the Ground Detector strip charts.

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In addition to the two violations described above, four other violations were identified and are described in the enclosed Notice under violations not assessed a civil penalty.

To emphasize the need for management to improve performance with respect to drawing control, post modification testing activities and operator response to indicated electrical ground conditions, I have been authorized, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Regional Operations, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalties in the amount of One Hundred Twenty-Five Thousand Dollars (\$125,000) for the violations described in the enclosed Notice. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR, Part 2, Appendix C (1988) (Enforcement Policy), the violations assessed civil penalties have each been categorized at Severity Level III.

The base value of a civil penalty for a Severity Level III violation is \$50,000. The escalation and mitigation factors in the Enforcement Policy were considered. The base civil penalty amount for Violation I.A has been increased by 50 percent because of your failure to take prompt and extensive corrective actions to prevent recurrence. Although the violation was eventually identified by the plant staff, no mitigation of the civil penalty for that factor is deemed appropriate given that you had a number of prior opportunities to identify the problem. Specifically, this problem would have been identified if there had been proper followup of the architect-engineers discovery of an electrical termination error, proper dispositioning of the post modification test results, or proper evaluation of electrical system ground detection indications. In the case of violation I.B. no escalation or mitigation of the base civil penalty was considered appropriate.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

September 15, 1988

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget, as required by the Paperwork Reduction Act of 1980, Pub. L., No. 96-511.

Sincerely,

for *Carl J. Papariello*
A. Bert Davis
Regional Administrator

Enclosures:

- 1. Notice of Violation and Proposed Imposition of Civil Penalties
- 2. Inspection Reports
No. 50-254/88011(DRS);
No. 50-265/88012(DRS)

cc w/enclosures:

- C. Reed, Senior Vice President
- H. Bliss, Nuclear Licensing Manager
- R. L. Bax, Plant Manager DCD/DCB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Richard Hubbard
- J. W. McCaffrey, Chief, Public Utilities Division

BWS
 RIII *BWS* OE OGC DEDRO RIII *Miller* RIII *Greenman* RIII *Papariello* RIII *Davis*
 Stapleton/ib Lieberman Chandler Taylor *9/15/88* *9/15/88* *9/15/88* *9/15/88*

Distribution

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DCD/DCB (RIDS)

J. M. Taylor, DEDRO

J. Lieberman, OE

L. Chandler, OGC

T. Murley, NRR

RAO:RIII

PAO:RIII

SLO:RIII

M. Stahuiak, RIII

Enforcement Coordinators

RI, RII, RIV, and RV