

Commonwealth Edison Company  
Quad Cities Generating Station  
22710 206th Avenue North  
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Tel 309-654-2241

**ComEd**

ESK-97-149

July 24, 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 50-254/97009  
and 50-265/97009.

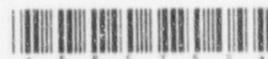
Reference: M. Leach to E. S. Kraft, Jr. Letter dated July 1, 1997

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violation (NOV) transmitted with the referenced letter. The report cited a Severity Level IV violation concerning Inadequate Radiological Controls.

This letter contains the following commitments:

1. Incorporate in QCAP 0620-01, "High Radiation Area Access", that the independent verifier, who ensures the area is locked, will initial a log to verify that everyone is out of the area. The procedure will be revised by August 29, 1997. (NTS # 254-100-97-00901.01)
2. As a result of the discussion in Attachment B (inspector request for additional information), any reference to the use of flashing lights will be deleted from QCAP 0620-01, High Radiation Area Access. (NTS # 254-100-97-00901.02)

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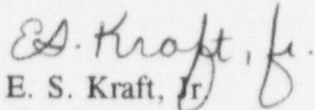


IEDI/1

July 24, 1997

If there are any questions or comments concerning this letter, please refer them to Mr. Charles Peterson, Regulatory Affairs Manager, at (309) 654-2241, ext. 3609.

Respectfully,

  
E. S. Kraft, Jr.  
Site Vice President  
Quad Cities Station

Attachments: (A) "Response to Notice of Violation"  
(B) "Request for Additional Information"

cc: A. B. Beach, Regional Administrator, Region III  
R. M. Pulsifer, Project Manager, NRR  
C. G. Miller, Senior Resident Inspector, Quad Cities  
W. D. Leech, MidAmerican Energy Company  
D. C. Tubbs, MidAmerican Energy Company  
F. A. Spangenberg, Regulatory Affairs Manager, Dresden  
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M. E. Wagner, Licensing, ComEd

**ATTACHMENT A**  
**Response to Notice of Violation**  
**ESK 97-149**  
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**STATEMENT OF VIOLATION (N&C IR 97-009-01):**

**NOTICE OF VIOLATION**

10 CFR 20.1601(d) requires that the licensee establish the controls required by paragraphs (a) and (b) of this section in a way that does not prevent individuals from leaving a High Radiation Area.

Contrary to the above, on May 15, 1997, the licensee failed to provide an individual an exit from the Unit 2 Drywell, which was a posted Locked High Radiation Area controlled per 10 CFR 20.1601(a) and (b).

This is a Severity Level IV violation (Supplement IV).

**REASON FOR VIOLATION:**

The cause of the event was determined to be a personal performance problem on the part of the Contract RPT (CRPT), who as the LHRA Timekeeper, failed to verify all personnel had exited the LHRA prior to locking it down.

**ACTIONS TAKEN:**

1. The Timekeeping CRPT was notified and released the Operator from the U2 Drywell/Bull Pen.
2. The two CRPTs involved in the event were denied access to RPAs until the investigation could be completed.
3. The CRPTs involved were disciplined, with one being released from duties at the station.
4. Other LHRAs were evaluated for egress capability.

**ACTIONS TO PREVENT FURTHER OCCURRENCE:**

Incorporate in QCAP 0620-01, "High Radiation Area Access", that the independent verifier, who ensures the area is locked, will initial a log to verify that everyone is out of the area. The procedure will be revised by August 29, 1997. (NTS # 254-100-97-00901.01).

**DATE WHEN FULL COMPLIANCE WILL BE MET:**

Full compliance was met on May 15, 1997 when the individual was released from the Drywell.

**ATTACHMENT B**  
**Request for Additional Information**  
**ESK 97-149**  
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In the evaluation for compliance of other LHRA's with the requirements of 10 CFR 20.1601(d), the controls used at the 1B RHR room during HPCI operation were found to be incorrect. During HPCI operation, the Reactor Building Basement area on the affected unit is normally controlled as a LHRA. The egress point used was formerly controlled with a chain and pad lock. The RPT would lock himself in the area with the key. The RP department concluded that this practice could lead to personnel being locked in the area if the RPT lost the key or was injured. Dead bolts with latches that allow opening from the inside without a key were ordered. Until the dead bolts could be installed, RP decided to use a flashing light and posting to control the 1B RHR room entrance. This decision was based upon the interpretation of the procedure that RP could control this LHRA with a flashing light and posting. RP did not want to lock the area because of the safety concern. This interpretation led to the incorrect usage of the flashing light to control the LHRA.

No unauthorized access to the LHRA had occurred during the usage of the flashing light. RP came to this conclusion due to a seal being placed on the door, indicating that no one had attempted to or accessed the area.

To prevent the incorrect usage of a flashing light to control LHRA's in the future, any reference to the use of flashing lights will be deleted from QCAP 0620-01, High Radiation Area Access. (NTS # 254-100-97-00901.02).