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ComEd

SVP-97-197

September 23, 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 50-254/97011
and 50-265/97011.

Reference: (a) G. E. Grant letter to E. S. Kraft, Jr. dated August 26, 1997.
(b) E. S. Kraft, Jr. letter (97-149) to USNRC dated July 24, 1997.

Enclosed is Commonwealth Edison's (ComEd's) response to one of the three Notice of Violations (NOV) transmitted with reference (a). The report cited a Severity Level IV violation concerning a Locked High Radiation Area not being locked or attended. A response to the other two NOV's will be forwarded by separate correspondence.

This letter contains the following commitment:

QCAP 0620-01, High Radiation Area Access will be revised to incorporate the Rad/Chem Superintendent's written approval for the use of a flashing light. (NTS 254-100-97-01105-01).

This revision to the above procedure, changes a prior commitment made in reference (b). The prior commitment stated that Quad Cities would delete any reference to the use of the flashing light in QCAP 0620-01, High Radiation Area Access. After further review, the station has determined that deletion of use of the flashing light is not appropriate. Eliminating use of a flashing light, has the potential to increase personnel exposure by requiring personnel to attend the Locked High Radiation Area or having to build an enclosure around the area.

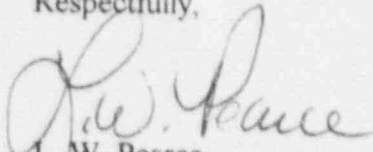
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September 23, 1997

If you have any questions concerning this letter, please contact Mr. Charles Peterson, Regulatory Affairs Manager, at (309) 654-2241, extension 3609.

Respectfully,



L. W. Pearce
Site Vice President
Quad Cities Station

Attachment A, Response to Notice of Violation

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
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ATTACHMENT A
RESPONSE TO NOTICE OF VIOLATION
SVP-97-197
PAGE 1 OF 2

NOTICE OF VIOLATION (50-254;265/97011-05)

Technical Specification 6.12.B requires that areas accessible to personnel with radiation levels greater than 1000 mrem/hr have doors locked or attended.

Contrary to the above, on July 2, 1997, the inspectors identified that the gate from the reactor building ground level to the Unit 1 "B" residual heat removal room was posted as a locked high radiation area but the gate was neither locked nor attended.

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

Root Cause Analysis:

ComEd accepts this violation. This event was determined to be a rule-based error. Technical Specification 6.12.B.5., states "for individual High Radiation Areas accessible to personnel with radiation levels of greater than 1000 mrem/h at 30 cm (12 in.) that are located within large areas where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual areas, then such individual areas shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device." This was directly incorporated into QCAP 0620-01, High Radiation Area Access. This incorporation into the procedure produced inadequate instructions on when a flashing light could be used to control a Locked High Radiation Area (LHRA). The lack of specific instructions for the use of a flashing light allowed for a misinterpretation of QCAP 0620-01.

Corrective Actions taken:

Following the identification of the event, the 1B RHR gate was continually attended until the Reactor Building Basement was released from LHRA status.

The guidelines used to control steam-affected areas during HPCI/RCIC runs was rewritten and incorporated into the appropriate Radiation Work Permit (RWP).

A dead bolt lock with a latch that will allow opening from inside the area without a key was installed on the 1B RHR gate.

To prevent the incorrect usage of a flashing light to control LHRA's in the future, QCAP 0620-01, "High Radiation Area Access" will be revised to require the approval on the usage of a flashing light to control a LHRA in writing from the Rad/Chem Superintendent.

**ATTACHMENT A
RESPONSE TO NOTICE OF VIOLATION
SVP-97-197
PAGE 2 OF 2**

Corrective Actions to prevent further occurrence:

The revision to QCAP 0620-01 will be completed by October 31, 1997.
(NTS# 254-100-97-01105.01)

Date When Full Compliance will be met:

Full compliance was met when the Unit 1 "B" Residual Heat Removal Room was attended by a Radiation Protection Technician (RPT) on July 2, 1997.