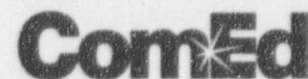


Commonwealth Edison Company
Quad Cities Generating Station
22710 206th Avenue North
Cordova, IL 61242-9740
Tel 309-654-2241



SVP-98-094

March 13, 1998

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Quad Cities Station Units 1 and 2
Revised Response to Notice of Violation (NOV) 97-014-07
NRC Inspection Report Numbers 50-254/97014 and 50-265/97014
NRC Docket Numbers 50-254 and 50-265

Reference: (a) G. E. Grant to L. W. Pearce letter dated December 16, 1997
(b) E. S. Kraft, Jr. letter (SVP-98-005) dated January 22, 1998 to USNRC
(c) E. S. Kraft, Jr. letter (SVP-98-057) dated February 20, 1998 to USNRC

After subsequent review of our initial response it was determined a revision to NOV 97-014-07 was required. The violation is as follows:

Violation 97-014-07 cited a failure of Quad Cities Operating Surveillance (QCOS) 2900-01, Revision 12, Quarterly Safe Shutdown Makeup Pump Flow Rate Test", to adequately incorporate design requirements and provide assurance that adequate instrumentation would be used to demonstrate that the safe shutdown makeup pump system would perform satisfactorily in service.

Quad Cities agrees that Surveillance QCOS 2900-01 Revision-12 did not adequately incorporate reference to design requirements. Quad Cities does not agree that test acceptance criteria did not incorporate instrument tolerances to ensure that the flow and system head design requirements would be met.

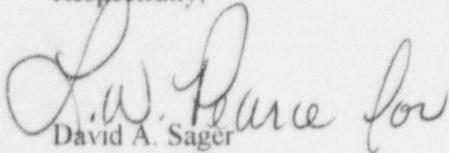
The ongoing AE inspection has raised an instrument uncertainty issue. Quad Cities will address this issue in cooperation with the AE Inspection Team.

9803240046 980313
PDR ADOCK 05000254
G PDR

March 13, 1998

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,



David A. Sager
Site Vice President
Quad Cities Station

Attachment A, "Revised 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
F. A. Spangenberg, Regulatory Affairs Manager, Dresden
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SVP Letter File

ATTACHMENT A
REVISED RESPONSE TO NOTICE OF VIOLATION
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NOTICE OF VIOLATION (50-254(265)/97014-07)

Title 10 CFR 50, Appendix B, Criterion XI, "Test Control," requires, in part, that testing required to demonstrate that systems and components will perform satisfactorily in service be performed in accordance with written test procedures which incorporate acceptance limits contained in applicable design documents. Test procedures shall include provisions for assuring that adequate test instrumentation is available and used.

TS 4.8 J.2 states, "The safe shutdown makeup pump (SSMP) system shall be demonstrated operable: At least once per 92 days by verifying that the SSMP develops a flow of greater than or equal to 400 gpm against a system head corresponding to reactor vessel pressure of greater than 1120 psig."

Contrary to the above:

From September 23, 1996, until approximately July 29, 1997, Quad Cities Operating Surveillance (QCOS) 2900-01, Revision 12, "Quarterly Safe Shutdown Makeup Pump Flow Rate Test," did not adequately incorporate design requirements and provide assurance that adequate instrumentation would be used to demonstrate that the safe shutdown makeup pump system would perform satisfactorily in service. Test acceptance criteria did not incorporate instrument tolerances to ensure that the flow and system head design requirements would be met.

This is a Severity Level IV violation (Supplement I). (50-265/97014-07; 50-265/97014-07).

REASON FOR THE VIOLATION

1. Quad Cities accepts the violation that Surveillance QCOS 2900-01 Revision-12 did not adequately incorporate reference to design requirements.

The SSMP surveillance discharge pressure criteria was validated to design requirements through a Sargent & Lundy review of the original design calculation (S&L Letter: 10/26/88).

Reference to the S&L calculation review was not adequately incorporated in Surveillance QCOS 2900-01.

2. Quad Cities does not agree that Surveillance Procedure QCOS 2900-01 Revision-12 did not provide assurance that adequate instrumentation was used, or that test acceptance criteria did not incorporate instrument tolerances to ensure that the flow and system head design requirements would be met. Explicit determination of instrument uncertainties is not required, per the Quad Cities original design basis.

During development of the original design basis of Quad Cities the explicit incorporation of instrument uncertainties was not a common practice. NUREG 0138, issued November 1976 confirmed that instrument uncertainties need not be backfit for plants licensed before 1974. Quad Cities was designed as a nominal value plant, which was typical for plants of this vintage (1972).

ATTACHMENT A
REVISED RESPONSE TO NOTICE OF VIOLATION
SVP-98-094
(Page 2 of 2)

The NUREG states:

"...in this approach, the discrete components of each of the margins to safety in trip setpoint values are not evaluated on an individual basis but are include in an overall safety margin." ... "The magnitude of this safety margin and the resulting set points are established to ensure that there is a low probability of the margin being removed by an adverse combination of instrument calibration error, instrument error and instrument drift."

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

For Item #1: Surveillance QCOS 2900-01 Revision-12 did not adequately incorporate reference to design requirements:

1. An instrument error analysis (ER 9604270, 10/16/97) and detailed calculation (NDIT 97-096, 10/2/97) was performed to determine the minimum pressure criteria, including instrument uncertainties.

Subsequently, QCOS 2900-01 was revised (Revision-13, October 16, 1997) to include adequate reference to design requirements, and to require a high accuracy pressure instrument to further assure the acceptance criteria is met.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

For Item #1: Surveillance QCOS 2900-01 Revision-12 did not adequately incorporate reference to design requirements:

1. The modification process was revised since the installation of the SSMP. Nuclear NEP 12-01, "Preparation, Review, and Approval of Design Input Requirements (DIR)," Section 5.2.1.16 "Instrument and Control Requirements" currently specifies applicable DIR properties including range of measurement, calibration, accuracy, and instrument location. The Instrument and Control Requirements in NEP-12-01 are referred to in NEP-04-01, "Plant Modification."

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

For Item #1: Surveillance QCOS 2900-01 Revision-12 did not adequately incorporate reference to design requirements:

Full compliance was achieved when QCOS 2900-01 Revision-13 was issued on October 16, 1997.