

Commonwealth Edison Company
Quad Cities Generating Station
22710 206th Avenue North
Cordova, IL 61242-9740
Tel 809-654-2244



SVP-98-120

April 2, 1998

Mr. A. Bill Beach
Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Subject: Quad Cities Nuclear Power Station Pre-Startup Actions

Dear Mr. Beach:

On Friday, March 27, 1998, ComEd representatives and NRC Staff members met to discuss preparations for startup of the Quad Cities Nuclear Power Station. We described the actions taken and planned to resolve a number of key issues prior to startup. The purpose of this letter is to confirm the remaining actions we plan to take prior to startup. Attachment A describes the actions planned prior to startup to resolve each issue. These actions include those discussed during the March 27 meeting as well as additional actions not covered during the meeting.

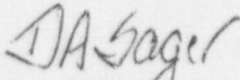
As discussed during our meeting on March 27, we intend to confirm our readiness for startup through use of a formal readiness evaluation process. A Readiness Review Board consisting of senior executives has been established and is chaired by the ComEd BWR Vice President. This Board will evaluate readiness for startup through: observation of site activities; presentations by site management; review of departmental readiness assessments; review of findings of assessments by the Quad Cities Quality and Safety Assessment (Q&SA) organization; and confirmation of the satisfactory resolution of the issues described in Attachment A. As part of the departmental readiness assessments, we will review to identify conditions that could affect the operability of plant safety equipment but may not have been resolved. A number of the items in Attachment A represent actions to resolve these kinds of past issues.

11
1126

9804100111 980402
PDR ADOCK 05000254
P PDR

In our upcoming public meetings with the NRC Staff between now and startup, we will provide information on our progress in each of these areas. Please call me or Charles Peterson, the Quad Cities Regulatory Affairs Manager, if you have any questions or your understanding of these issues differs from the description in Attachment A.

Respectfully,



David A. Sager
Site Vice President
Quad Cities Nuclear Power Station

Attachment A, Quad Cities Nuclear Generating Station Pre-Startup
Action List

cc: NRC Document Control Desk
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
INPO Records Center
Office of Nuclear Facility Safety, IDNS
DCD License (both electronic and hard copies)
M. E. Wagner, Licensing, ComEd
SVP Letter File

**Quad Cities Nuclear Power Station
Pre-Startup Action List
April 2, 1998**

The following items will be completed prior to startup of the Quad Cities units. To oversee the completion of these actions and evaluate readiness, a Readiness Review Board consisting of the BWR Vice President and other senior executives has been established. This Board will confirm completion of these actions and evaluate readiness through review of departmental readiness assessments, performance indicator data, and other information.

OPERATIONS

- A. Strengthen Operations Leadership Role
 - 1. Define and initiate management and supervisory shift observations to evaluate operator performance and reinforce operations standards prior to and during startup.
 - 2. Define and initiate management and supervisory support activity observations to evaluate performance and reinforce human performance standards prior to and during startup.
- B. Ensure Technical Specification Compliance
 - 1. Review surveillances required by Technical Specifications against implementing procedures to ensure that the procedures properly implement the Technical Specification surveillance requirements.
 - 2. Proceduralize mode change checklists so that surveillance requirements for mode changes are clearly defined.
 - 3. Implement procedure for "conditional surveillances."
 - 4. Confirm that items removed from technical specifications are addressed by satellite programs.
 - 5. Perform independent review of surveillance program by non Quad Cities personnel.
 - 6. Complete Q&SA assessment of surveillance program.

C. Ensure Configuration Control

1. Complete valve lineups to support startup.
2. Complete breaker lineups to support startup.
3. Complete sample independent verification of valve and breaker lineups by SRO.

D. Address Emergency Diesel Generator (EDG) Personnel Errors

1. Complete Effectiveness Review of corrective actions associated with EDG failures attributed to human performance.
2. Complete Human Error Reduction Training for operators and maintenance personnel.
3. Complete EDG problem sensitivity training of operators and mechanics.
4. Perform standby lineup verification of EDG after monthly run.
5. Dedicate operator to EDG monthly surveillance.

ENGINEERING

A. Ensure Emergency Diesel Generator Equipment Reliability

1. Resolve Unit 1 output breaker trip problem.
2. Validate maintenance frequency for checking Time Delay Relays.
Complete designated maintenance activities on Unit 1/2 Diesel.
4. Complete analysis of air start system failures; identify corrective action to improve reliability as warranted.

B. Ensure 50.59 Evaluation Adequacy

1. Establish 50.59 Review Board for ongoing evaluation of quality of 50.59 reviews and evaluation of preparers.

2. Define 50.59 review process to be used by the 50.59 Review Board.
 - Define potential remediation steps for preparers whose work quality requires improvement.
 - Define criteria for suspension of preparer qualifications.
 3. Issue clear guidance on requirements for screening vs. full 50.59 evaluation.
 4. Provide training to Plant Operating Review Committee (PORC) on GL91-18 and 50.59 -- getting issues into the 50.59 screening and evaluation process.
 5. Complete Q&SA assessment of effectiveness of Engineering Assurance Group 50.59 review.
- C. Ensure In Service Inspection Program Adequacy -- Actions Complete
- D. Ensure In Service Testing Program Adequacy
1. Complete programmatic review of IST program to ensure that program requirements are correct.
 2. Complete system and component review to ensure compliance with program.
 3. Test additional valves as scheduled prior to startup.
 4. Submit three relief requests to NRC.
- E. Resolve Reactor Building Temperature Issue
1. Complete physical work to implement setpoint changes and overload changeouts.
 2. Complete operational evaluation.
 3. Complete UFSAR update and associated 10 CFR 50.59.
- F. Resolve Scram Discharge Volume Issue
1. Evaluate reportability of scram discharge volume issue.

2. Revise calculation to support scram discharge volume setpoint.
 3. Implement new setpoint to resolve temperature effect and negative margin.
 4. Review to identify other potential nonconservative setpoint calculations.
- G. Resolve Appendix R Issues
1. Review and approve revised Safe Shutdown Analysis.
 2. Complete pre-startup modifications.
 3. Issue revised procedures to address changes to Safe Shutdown Analysis.
 4. Train personnel on revised procedures and Safe Shutdown Analysis.
 5. Submit response to CAL.
- H. Complete Hydro Testing on Both Units
- I. Complete Resolution of Designated Problems on Maintenance Rule A1 Systems.
- J. Resolve Issues from Design Inspection
1. Revise procedures to ensure operability of ultimate heat sink.
 2. Revise procedures to resolve potential containment overpressure/flooding.
 3. Confirm alternate shutdown cooling (NUREG 0737)
 4. Complete EDG loading analysis and modify operating procedure to ensure compliance with new analysis.

MAINTENANCE

- A. Resolve the Following Repetitive Maintenance Issues
1. Complete work on Unit 1 turbine bearings 8 and 9 to resolve longstanding fire protection compensatory action.
 2. Complete work on Unit 1 reactor vessel O-ring to correct repetitive leakage.
 3. Complete work on condensate demineralizer controller to permit automatic operation.
 4. Complete 6 designated operator workarounds.
 5. Complete work on Unit 1 reactor vessel drain line to correct leakage.
 6. Complete work on Unit 1 A RHR pump to correct low flow condition.
 7. Complete preventive maintenance on Unit 1/2 EDG.
 8. Complete work on HPCI 29 & 30 valves to correct slow stroke times.
 9. Complete work on 11 designated control room corrective work requests.
- B. Complete Preventive Maintenance of 4KV, 480VAC and 250VDC Switchgear

PLANT SUPPORT

- A. Strengthen Quality and Safety Assessment (Q&SA) and Strengthen Line Management Ownership of Corrective Actions
1. Establish Q&SA management attendance at Station Senior Leadership Group meetings.
 2. Increase Q&SA presence in monitoring site operational activities -- 24 hour coverage.

3. Establish monthly quality issues meeting with senior station management to provide focus on emerging issues and areas of quality concern.
4. Establish site Q&SA monthly report review meetings to ensure clear site awareness of quality issues.
5. Upgrade site monthly report format and content to improve focus on significant issues for site management.