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SVP-98-200

ComEd

May 29, 1998

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

Attention: Document Control Desk

Subject: Quad Cities Station Units 1 and 2
NRC Inspection Report Numbers 50-254/98004 and 50-265/98004
NRC Docket Numbers 50-254 and 50-265
Facility Operating License Numbers DPR-29 and DPR-30

Reference: (a) J. A. Grobe (NRC) Letter to O. D. Kingsley (ComEd), dated April 23, 1998, "NRC Inspection Report 50-254/98004 and 50-654/98004"

(b) Telephone call between NRC staff and Charles Peterson (ComEd), May 26, 1998.

Enclosed is Commonwealth Edison's (ComEd's) response to the Notice of Violations (NOV's) transmitted in Reference (a). The responses to the 5 violations are detailed in Attachments A through E. In Reference (b), the NRC staff granted an extension of the due date until May 29, 1998.

Additionally, Reference (a) requested that ComEd respond to the following two issues:

Issue One:

"In your response, you should address actions taken to ensure the rigor of configuration control processes including out-of-service tagouts."

The Station recognizes there has been an unacceptable level of performance in configuration control and has taken steps to improve this performance. The initial actions were to ensure the adequacy of the current configuration. All plant valve and electrical lineup position verifications were performed for the Unit 2 Startup where previously the Station limited the verifications based on the scope of outage work. An additional Senior Reactor Operator review was added to 10 percent of these verifications as a quality check.

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Additional actions were taken to ensure the configuration was monitored closely on a regular basis. The scope of the Emergency Core Cooling System monthly lineup has been expanded to verify physical configuration control barriers have been maintained, and random plant valve and electrical lineup verifications are now performed monthly for other plant systems to ensure configuration control is being maintained.

Operations training on configuration management was conducted at the end of 1997 and additional training has been provided in 1998 to increase operator sensitivity to this issue. When events have occurred, event descriptions are posted to emphasize the importance of maintaining vigilance in this area. The Station has increasingly emphasized the use of discretional configuration control options within the out-of-service process. For example, Operations supervision requests plant valve lineup verifications performed within the zone of protection prior to the return to service whenever the integrity of the configuration is questioned. Senior management was present, around the clock, during the Unit startup to monitor and ensure high standards of personnel performance. These overviews were documented and reviewed during power ascension to verify standards were met prior to continuing power ascension.

Investigation of events identifying configuration control concerns has prompted additional preemptive actions. The first two violations identified in this report are examples of out-of-service errors arising from deficient human performance as opposed to programmatic deficiencies in the out-of-service process. Human performance trends are monitored through the Station's corrective action process with monthly station indicators. The Station has recently completed training of site personnel on human performance error reduction techniques and continues to inform personnel on issues affecting human performance. Stand-downs, emphasizing procedure adherence and configuration control, increasing the in-plant supervisor presence and feedback, and assigning appropriate discipline for unacceptable performance are being used to improve the performance of Non-licensed Operators. The accountability of station personnel for control of contractors has also been strengthened, clarified, and communicated throughout the Maintenance organization. Both escort and visitor must review and sign written expectations that manipulations must be approved by designated Station personnel.

The Station is currently participating in a ComEd multi-Station effort to review and upgrade the overall implementation of configuration control.

Issue Two:

"In addition, you should address why previous corrective actions for surveillance violations were ineffective and what new methods will be in place to ensure that corrective actions taken are working effectively."

On September 25, 1997, the station initiated a root cause investigation due to an adverse trend in Technical Specification (TS) compliance. The investigation concluded on November 11, 1997 with 16 corrective action items assigned throughout the organization.

While these corrective actions were beneficial to the Station, they were not comprehensive. One of the corrective actions performed was to review procedures against the TS requirements and ensure the procedure implemented the TS. This corrective action was too narrowly focused to prevent violation numbers three and four cited in this NOV. In violation number three, the review did not consider the setpoint of the switch to meet the TS requirement, but rather only identified that the TS requirement for monitoring was being performed. In violation number four, the review only considered that the source range monitors were being tested, not that the frequency was properly implemented for this surveillance in the Cold Shutdown Mode. Another of the corrective actions from the root cause investigation was to ensure that the station's electronic work control system (EWCS) contained the necessary predefines for implementing TS surveillance requirements. As part of this review, the frequency and mode data were verified, however the adequacy of the substitution or suspension processes were not verified.

On February 25, 1998, a new method was developed to supplement EWCS and ensure TS compliance. This manual entry method employs the use of matrices with sign-offs to indicate completion of TS surveillances. A Senior Reactor Operator then reviews the matrices once per shift to maintain TS compliance. If open items are identified, verification of completion or verification of scheduling is accomplished to ensure TS compliance. Since the new method has been implemented, there have been no missed surveillance requirements. This new method will remain in parallel with EWCS until the Station has sufficient confidence in the Station's implementation of EWCS.

Several other new actions have been taken. The Station TS Coordinator reviews all new or revised procedures implementing the Station's TS. The number of personnel who can access the EWCS database system has been restricted, and those with access have been counseled on their responsibility to maintain the accuracy of the system. Additionally, detailed checklists have been developed to improve the Station's TS compliance during plant Mode changes.

A Technical Specification Assurance Plan has been implemented as the Station's comprehensive approach to TS compliance. This plan has assigned clear, line-by-line responsibilities for all TS. Each responsible party identified how the requirements are currently satisfied and how they will continually assess and assure compliance in the future. The Station TS Coordinator has been given the authority to provide a central oversight to ensure continued TS compliance.

This letter contains the following new commitments:

For Violation 98-004-01:

- The increased level of supervisory attention to the NLO positions will be maintained. A self-assessment will be performed on NLO performance. (NTS # 2541009800401.01, due July 17, 1998)

For Violation 98-004-02:

- An effectiveness review of corrective actions taken will be performed. This effectiveness review is scheduled to be completed by April 1, 1999. If warranted, additional corrective measures will be implemented as this review is completed. (NTS# 26520098SCAQ0000304, due April 1, 1999)

For Violation 98-004-03:

- No new commitments for this violation.

For Violation 98-004-04:

- A TS compliance assessment will be performed to verify adequate permanent processes are implemented, including the incorporation of TS data into EWCS. (NTS # 26518098SCAQ0000103, due July 1, 1998)

For Violation 98-004-05:

- The Snubber Coordinator is in the process of revising the snubber procedures, QCAP 0410-05, QCTS 0750-01 and QCTS 0750-05 to enhance the prerequisites section to ensure verification of upcoming due dates for testing and inspection (NTS # 2541009800405.01, due September 1, 1998).

- The predefines will be upgraded to have an auto trigger to initiate a nuclear work request (NWR) to perform the required surveillance (NTS # 2541009800405.02, due September 1, 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.

Sincerely,

Joel P. Dimmette, Jr.
Site Vice President
Quad Cities Station

Attachments A – Response to violation 50-254(265)/98004-01
B – Response to violation 50-254(265)/98004-02
C – Response to violation 50-254(265)/98004-03
D – Response to violation 50-254(265)/98004-04
E – Response to violation 50-254(265)/98004-05

cc: C. J. Paperiello, Acting Regional Administrator, Region III
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NOTICE OF VIOLATION (50-254(265)/98004-01)

Technical Specification 6.8.A.1 required that procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be established, implemented and maintained.

Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, Section 4.w.(2).(b) required instructions for energizing onsite electrical AC (Alternating Current) systems.

Quad Cities Operating Procedure 6500-7, Revision 6, "Racking in a 4160 Volt Horizontal Type AMH, AMHG, or G26 Circuit Breaker", Attachment H, required charging the breaker closing spring.

Contrary to the above, on March 14, 1998, non-licensed operators performing Quad Cities Operating Procedure 6500-7, Revision 06, Attachment H, failed to charge the breaker closing spring for the Unit 2 Station Blackout Diesel Generator output breaker to Bus 71 when the breaker was returned to service.

This is a Severity Level IV violation. (50-265/98004-01)

REASON FOR THE VIOLATION:

ComEd accepts this violation.

The reason for the event was inadequate procedure adherence. On 3/14/98, two Equipment Operators (EO) performed a return to service (RTS) on the Unit 2 Station Blackout (SBO) Diesel Generator. One EO performed the RTS and the other EO performed an independent verification. The generator discharge breaker (SBO DG 2 Feed to Bus 71) was to be returned to the racked in position. Attachment H of QCOP 6500-07, "Racking in a 4160 Volt Horizontal Type AMH, AMHG, or G26 Circuit Breaker", is a checklist used by the operator for racking in this type of breaker. Steps in this checklist require, "Place Spring Motor Lockout Switch to Operate (down) and verify Closing Spring Charges (lever up)". This step was not performed, preventing the breaker from operating on a close signal. The 2 EO's did not recall any details concerning the evolution.

The discrepancy was not identified until 3/20/98 due to operator inattention on rounds. On 3/15/98 through 3/19/98, the EO that performed the independent verification for the RTS filled the position of night shift Outside EO every day except for 3/18/98. During the night shift, the EO opens the door of each breaker cubicle when verifying that all 4KV Bus 71 breakers have their closing springs charged and the lockout switches are in the "Operate" position. The EO noticed the Unit Two SBO Diesel Generator output breaker was not in a charged state, but did not notify supervision, circle the reading, or tell his relief of the off-normal breaker's status as required. On 3/18/98, a different operator filled the position of night shift Outside EO. This operator failed to notice that the breaker was not charged. On 3/20/98 at 0203, another EO noticed that the Unit Two SBO Diesel output breaker was in the discharged position while performing the outside rounds and notified the Unit Two Supervisor.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The Equipment Operator who notified the Unit Two Supervisor took immediate corrective action. After inspecting the breaker and verifying the control power fuses were installed, the Spring Motor Lockout Switch was taken to "Operate" and the breaker springs charged.

Disciplinary actions were taken for the 3 operators involved in this event and one of the individuals was removed from the Operations Department.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

An Operations stand-down was conducted on 3/24/98 and 3/25/98 to address operator performance.

Operations has increased the supervisory overviews conducted on the non-licensed operator positions to emphasize and enforce department standards.

The increased level of supervisory attention to the NLO positions will be maintained. A self-assessment will be performed on NLO performance by 7/17/98. (NTS # 2541009800401.01, Due Date 07/17/98)

DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

Full compliance was met on 3/20/98 with the charging of the Unit 2 Station Blackout Diesel Generator output breaker to Bus 71.

NOTICE OF VIOLATION (50-254(265)/98004-02)

Technical Specification 6.8.A.1 required that procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978, be established, implemented, and maintained.

Regulatory Guide 1.33, Revision 2, February, 1978, Appendix A, Section 1.C, required administrative controls for equipment control (locking and tagging).

Quad Cities administrative procedure 230-04, "Equipment Out-of-Service", Revision 20, Section D.2.B.(3), states "Components shall never be operated while an OOS (out-of-service) card is attached".

Out-of-service (OOS) 970013277 required Valves 2-4799-919 and 2-4799-920, drain valves for the Unit 2 Instrument Air Compressor, to be tagged in the open position.

Contrary to the above, on March 26, 1998, operators identified valves 2-4799-919 and 2-4799-920, which were tagged as open, were in the closed position. The valves had been operated with the tags (OOS cards) attached.

This is a severity Level IV Violation.

REASON FOR THE VIOLATION

ComEd accepts this violation.

The root cause of the event was determined to be inadequate control of a vendor technical representative in visitor status by assigned escorts due to the assumption that the technical representative was knowledgeable of the OOS requirements.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Security Instruction No. 02, Revision No. 19, Attachment A, has been revised to include the statement "You shall not operate, manipulate, nor activate any equipment, component, switch, or circuit breaker unless specific permission is granted". This attachment is required to be signed by the visitor to ensure that visitors are informed of this requirement prior to entry into the protected area. (Completed 04/23/98)

Security Instruction No. 02, Revision No. 19, Attachment B, has been created detailing the duties and responsibilities of the visitor escort. This attachment is signed by the escort and is maintained by the escort until the visitor leaves the protected area. (Completed 04/23/98)

A ComEd Training Initiation Worksheet to evaluate implementing a training program for visitors to the sites has been initiated. (Completed 04/23/98)

The first line supervisor and the mechanics involved with this event have been counseled. (Completed 04/23/98)

Due to the short time frame for implementation of the corrective actions, results of the actions cannot be fully evaluated. It should be noted however, that since the date of the event (March 23, 1998), there have been no similar issues at Quad Cities Station. In addition, the station's operating department is performing a full system by system equipment line-up verification in accordance with Quad Operating Mechanical (QOM) procedures. If additional items are identified, they will be investigated in accordance with the station's corrective action process.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

In addition to the actions detailed above:

A NTS item has been created to perform an effectiveness review of corrective actions taken. This effectiveness review is scheduled to be completed by April 1, 1999. If warranted, additional corrective measures will be implemented as this review is completed. (NTS# 26520098SCAQ0000304, Due Date April 1, 1999)

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

The plant achieved full compliance with the correction of the valve lineup on 03/26/98.

NOTICE OF VIOLATION (50-254/265/98004-03)

Technical Specification surveillance requirement 4.4.A.1.c stated that while in Modes 1, 2, and 5 (with any control rod withdrawn), the standby liquid control system shall be demonstrated operable at least once per 24 hours by verifying that the heat tracing circuit is operable by determining the temperature of the pump suction piping to be greater than or equal to 83 degrees Fahrenheit.

Contrary to the above, from September 23, 1996, to December 19, 1997, with Unit 1 in Modes 1, 2, and 5 (with any control rod withdrawn) and from September 26, 1996 to September 29, 1997 with Unit 2 in Modes 1, 2, and 5 (with any control rod withdrawn), the standby liquid control system was not demonstrated to be operable by determining the temperature of the pump suction piping to be greater than or equal to 83 degrees Fahrenheit. Temperature switches that provided input to an annunciator used to meet the surveillance requirement were found to set below 83 degrees Fahrenheit.

This is a Severity Level IV violation.

REASON FOR THE VIOLATION

ComEd accepts this violation. This event has been documented in LER 254/98-009.

On 02/10/98, with both Units in the Cold Shutdown Mode, it was determined that temperature switches, being used to perform daily verification of Unit 1 and Unit 2 Standby Liquid Control System (SBLC) suction piping heat trace operability, were set below the value needed to support Technical Specifications (TS) due to instrument calibration tolerance. This resulted in the inability to confirm the suction piping temperature has been maintained greater than or equal to the TS required value of 83 degrees Fahrenheit (F).

The cause of this event was the result of failure to establish a process during implementation of the Technical Specification Upgrade program (TSUP) for ensuring appropriate evaluation or calculation was conducted to support the choice of instrumentation or methods to meet added TS requirements. Implementing personnel had the opportunity to verify and validate the adequacy of temperature switches in this case; however, no defined process existed to cause this review. This resulted in determining the TS requirement could be verified by use of installed temperature alarms based on the alarm setting contained in Quad Cities Annunciator (QCAN) procedure, QCAN 901(2) 5 G-6. This determination did not consider or review instrument data sheets or calibration records to determine if the switch setpoint and setting tolerance would support the new requireme[illegible]

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

QCNPS Site Design Engineering performed a calculation to determine total instrument errors associated with taking suction pipe temperature readings using a calibrated hand held direct temperature read-out device with a surface contact type T thermocouple. (Completed 02/21/98)

The following procedures have been revised such that operators are now taking localized readings once per 24 hours:

- QOS 0005-01, "Operations Department Weekly Summary of Daily Surveillance". This procedure directs the Operations crews to take SBLC suction piping measurements once per 24 hours using the specific test equipment analyzed and approved for use under NDIT #QDC-98-066. (Completed 02/21/98)

- QCAN 901(2)-5 G-6, "Quad Cities Annunciator". This procedure gives guidance to the Unit operators should this alarm be received in the control room. This procedure directs the operations crews to perform QCOA 1100-01. (Completed 02/21/98)

- QCOA 1100-01, "SBLC Tank Abnormal Temperature". This procedure directs the crews to verify SBLC tank temperature controller indication, verify heat trace breaker operational, perform a direct read on the suction piping using the hand held device and verify heat trace controllers operational. (Completed 02/21/98)

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

Maintenance Department personnel performed a review of TS setpoints and validated calibration information for TS related instrumentation to ensure any involved tolerance values meet TS setpoints. (NTS 25418098SCAQ0000902; Completed 04/12/98). Results of this review indicated that this was an isolated case.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance with the TS, was achieved on 02/22/98 with the Operations crews taking localized readings.

NOTICE OF VIOLATION (50-254/265/98004-04)

Technical Specification 4.2.G.3.b required the performance of a source range monitor channel functional test at least once per 31 days when the reactor was in Modes 3 or 4 or Mode 2 with intermediate range monitors on Range 2 or below.

Contrary to the above, from December 20, 1997, until February 22, 1998, for Unit 1, and from October 15, 1997, until February 22, 1998, for Unit 2, a channel functional test of source range monitors was not performed with the reactor in Modes 3 or 4 or Mode 2 with intermediate range monitors on range 2 or below.

This is a Severity Level IV violation.

REASON FOR THE VIOLATION

ComEd accepts this violation. This event has been documented in LER 265/98-001.

On 11/22/97 at 2400, Unit 2 was in Cold Shutdown at 0 percent power when Technical Specification (TS) 4.2.G.3.b requirement to perform a SRM functional test every 31 days exceeded the required interval. On 01/27/98, the same Cold Shutdown TS requirement exceeded the required interval for Unit 1.

The cause of this event was inadequate implementation of the upgraded TS on 09/23/96. During the TS upgrade program, Quad Cities Instrument Surveillance (QCIS) 0700-10, "Refuel Neutron Monitoring Functional Test", was identified as the procedure to implement TS 4.2.G.3.b monthly testing requirements. QCIS 0700-10 was being performed on a weekly basis to satisfy this and other neutron monitoring TS surveillance requirements when in Modes 2 or 3 or 4 or 5. Although a revision to QCIS 0700-10 was done, the change did not clearly identify the new monthly TS Mode 4 testing requirement. In 1997, in an effort to reduce the weekly testing being performed when in Mode 4, a TS review for Mode 4 weekly surveillance requirements and a procedural review for Mode 4 TS weekly testing requirements was performed. The review concluded that only the intermediate range monitors (IRM) were required to be tested weekly in Mode 4. A new procedure was created and implemented for this testing and QCIS 0700-10 weekly testing was reserved for Modes 2 or 3 or 5. Due to the inadequate procedure change to QCIS 0700-10 in 1996, the monthly TS SRM surveillance requirement was not considered when replaced by the new procedure.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The Unit 1 and Unit 2 SRMs were declared inoperable on 02/20/98 when the TS 4.2.G.3.b Mode 4 monthly requirement non-compliance was discovered.

A monthly SRM surveillance was implemented to satisfy the TS 4.2.G.3.b Mode 4 monthly requirement. This surveillance was performed for Unit 1 and Unit 2 on 02/22/98, and the SRMs were declared operable.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

An interim process for tracking the completion of TS required surveillances while in Mode 4 was implemented on 02/25/98. This paper tracking system requires Operations to directly monitor the completion of TS surveillances. An interim process for tracking the completion of TS required surveillances while in any Mode was implemented by 04/01/98, independent of the stations Electronic Work Control System (EWCS).

Operations clarified the responsibilities of the TS Coordinator position to address controls for TS surveillance predefines.

A TS compliance assessment will be performed by 07/01/98 to verify adequate permanent processes are implemented, including the incorporation of TS data into EWCS. (NTS # 26518098SCAQ0000103, due date 07/0198)

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance with the TS requirements was achieved with the implementation and performance of the new SRM surveillance on 02/22/98.

NOTICE OF VIOLATION (50-254(265)/98004-05)

Technical Specification 4.8.F.2 required a visual inspection of snubbers to be performed as required by Table 4.8.F.1. Table 4.8.F.1 required the inspection interval to be determined and documented prior to any inspection. Preventive Maintenance item #104537 set the interval for the visual inspection of Unit 1 at 18 months.

Technical Specification 4.8.F.5 required that at least once per 18 months, a representative sample of snubbers be tested in accordance with a preselected sample plan.

Contrary to the above, from February 1, 1996, until December 26, 1997, Unit 1 snubbers were not visually inspected, and from February 19, 1996, until January 6, 1998, functional testing of a predetermined representative sample of Unit 1 snubbers was not performed.

This is a Severity Level IV violation (50-254/98004-05).

REASON FOR THE VIOLATION:

ComEd accepts this violation.

The reason for this non-conformance was that the 18 month sample plan of snubber testing and inspection was not performed on time due to personal error. The wrong credit date was entered into the Electronic Work Control System (EWCS) predefine schedule during a change in frequency codes for conversion to the Upgraded Technical Specifications. The date was not verified to be accurate by the ISI/IST (Inservice Inspection/Inservice Testing) Group during the Snubber Coordinator's extended medical absence. The Snubber Coordinator did not take steps to verify the accuracy of the critical technical specification surveillance date upon his return. This resulted in all of the snubber sample selection (118 snubbers) for the 18-month period not being completed on time.

Technical Specification 4.8.F.2 required a visual inspection of snubbers to be performed as required by Table 4.8.F.1. This table required the inspection interval to be determined and documented prior to any inspection. This was determined from the previous interval (Q1R14) results and was documented in the final Q1R14 summary report. In addition, it was documented in the PM predefine to repeat the inspection surveillance during the next interval and not skip an interval as per Technical Specification Table 4.8.F.1.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Completed the remaining snubber functional tests and engineering evaluations on 01/08/98.

Completed the remaining snubber visual inspections and engineering evaluations on 02/14/98.

The Snubber Coordinator attended a meeting with his direct Supervisor and the Site Engineering Manager concerning the expectations concerning accountability for program requirements on 02/17/98.

The Unit 1 Snubber visual inspection and testing predefine dates were revised so that the proper TS 18-month inspection interval start date was incorporated on 03/02/98.

The Unit 2 Snubbers predefine dates were verified to be within their proper TS 18-month visual inspection interval on 02/19/98.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

Training was given to the Engineering Programs personnel on 04/08/98, regarding the significance of the PM predefine critical date and the importance of compliance to TS requirements (NTS# 25418098SCAQ0001001, Due Date: 05/29/98). This item was completed on 04/15/98.

Benchmark with ComEd Snubber PEER Group to verify inspection methodology and validating of surveillance dates (NTS#254180SCAQ0001003, Due Date: 05/29/98). This item was completed on 04/29/98.

Review and validate Engineering Programs TS Surveillances to ensure they have correct credit dates (NTS# 25418098SCAQ0001002, due Date: Prior to restart of either unit, currently scheduled 04/12/98). This item was completed on 03/30/98.

The Snubber Coordinator is in the process of revising the snubber procedures; QCAP 0410-05, QCTS 0750-01 and QCTS 0750-05 to enhance the prerequisites section to ensure verification of upcoming due date for testing and inspection (NTS # 2541009800405.01, Due Date 09/01/98).

The predefines will be upgraded to have an auto trigger to initiate a nuclear work request (NWR) to perform the required surveillance (NTS # 2541009800405.02, Due Date 09/01/98).

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved when the remaining snubber surveillances and engineering evaluations were completed on 02/14/98.