



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

November 6, 1979

Mr. Darrell G. Eisenhut, Acting Director  
Division of Operating Reactors  
Office of Nuclear Reactor Regulation  
Washington, D.C. 20555

Subject: Zion Station Units 1 and 2  
NRC Docket Nos. 50-295 and 50-304

Reference (a): September 21, 1979 letter from D. G.  
Eisenhut to All Pressurized Water  
Reactors

Dear Mr. Eisenhut:

Reference (a) requested Commonwealth Edison Company to perform numerous reviews of past events, management policies and procedures, and engineered safety system surveillance procedures with regard to Licensee Event Report (LER) No. 50-295/79-42 which occurred at Zion Station in May, 1979. In response, Commonwealth Edison has specific management review functions, verifications and on-going programs which address the NRC Staff concerns of Reference (a) and has utilized these reviews with regard to the incident of concern in Reference (a). A synopsis of these functions and reviews follows:

Commonwealth Edison's On-Site Review Function reviews in detail all procedure or equipment deviations that result in reportable occurrences (LERs) or Technical Specification violations. These reviews are performed to assure that the corrective actions taken in each instance are appropriate to prevent recurrence. This review function also reviews those procedural or equipment deviations that are classified as non-reportable occurrences including reactor scrams.

Upon completion of the on-site reviews, the Commonwealth Edison Off-Site Review Function reviews in detail all the deviation reports of both reportable and non-reportable occurrences to independently ascertain whether the corrective actions taken were appropriate and sufficient to prevent recurrence. The Off-Site Review Function also initiates additional action to be taken if the results of the on-site review are deemed inadequate. The Off-Site Review Function also performs an annual detailed historical analysis of all reportable occurrences to ascertain root causes for these deviations.

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Mr. Darrell G. Eisenhut:

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Commonwealth Edison Company Quality Assurance Department verifies on an audit basis that the Zion units are operating properly and that the station records are maintained and kept appropriately. In addition, the Quality Assurance Department, through its audit function, provides an additional oversight for the detection of repetitive items.

In January 1978, Commonwealth Edison Company initiated a PRO (Professionalism) Program at all of its generating stations. The goal of this program is to create in personnel an awareness of the need to perform their work in a professional manner. This program provides for a formal investigation of all personnel errors with incentives for positive (good) performance including recognition and rewards and with sanctions for poor performance. The Corporate PRO Committee meets monthly, reviews incidents to detect trends and decides upon corrective action.

Since the event described in the attachment to Reference (a) included personnel error, a PRO investigation was performed in accordance with the Professionalism Program. The corrective actions taken as a result of this investigation included:

1. Modification of push buttons to two-position switches; (The surveillance procedure which was in progress and contributed to the personnel error required one operator to simultaneously depress three push buttons.) and
2. The surveillance procedure was revised to include color coding of the test sections and the applicable test switches. (The personnel error had involved inadvertent skipping of one page of the procedure such that a step in the next test section was performed.)

Additionally, the other station safeguards logic procedures were reviewed for similar man-machine problems and none were identified.

The Station's surveillance tests have been reviewed periodically to improve test performance and to reduce potential challenges to the reactor protection system. Adequate cautions have been included and management verification added where necessary to ensure correct test performance. Plant operators and supervisors have been made aware of the importance of avoiding challenges to the protective features of the units.

Mr. Darrell G. Eisenhut:

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Please address any additional questions that you might have concerning this matter to this office.

One (1) signed original and thirty-nine (39) copies of this letter are provided for your use.

Very truly yours,

*D. L. Peoples*

D. L. Peoples  
Director of Nuclear Licensing

WFN:mae

SUBSCRIBED and SWORN to  
before me this 8<sup>th</sup> day of  
November, 1979.

May A. Evans  
Notary Public

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