



Commonwealth Edison
 72 West Adams Street, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690 - 0767

October 13, 1989

Mr. A. Bert Davis
 Regional Administrator
 U.S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Subject: Zion Nuclear Power Station, Units 1 and 2
 License Nos. DPR-39 and DPR-48
 Response to Inspection Report
 Nos. 50-295/89023 and 50-304/89021
NRC Docket Nos. 50-295 and 50-304

Reference: September 14, 1989 letter from RW Cooper to Cordell Reed

Dear Mr. Davis:

The letter referenced above transmitted the results of a routine safety inspection of the fire protection program, conducted by Mr. J. Holmes of your staff, at the Zion Nuclear Power Station. During the course of this inspection, it was determined that certain activities appeared to be in violation with NRC requirements. Our response to the violation is provided in the Attachment to this letter.

Please direct any questions that you may have regarding this matter to this office.

Very truly yours,

T.J. Kovach
 for T.J. Kovach
 Nuclear Licensing Manager

GET/sc1:0332T:1

Attachment

cc: Resident Inspector-Zion
 Chandu Patel-NRR

8911030084 891013
 PDR ADOCK 05000295
 Q PDC

OCT 16 1989

1031

ATTACHMENT

VIOLATION

Technical Specification Section 6.2, entitled "Plant Operating Procedures", requires that detailed written procedures be prepared, approved, and adhered to for the Fire Protection Program.

Section G.8 and G.9 of the licensee's station housekeeping/fire protection procedure require that in areas where transient fireload is excessive and presents a possible hazard to the plant equipment, an increased surveillance of the area may be required. The station fire marshal shall be consulted regarding areas of concern and the fire marshal will determine if additional fire equipment and increased surveillance are required.

Contrary to the above, on July 17, 1989, the licensee failed to adhere to the housekeeping/fire protection procedure in that the fire marshal was not contacted to determine if increased surveillance of elevation 579 of the auxiliary building was required due to the existence of a transient combustible (acetylene/oxygen welder's cart) that presented a possible hazard to redundant plant safe shutdown equipment (auxiliary feedwater pumps and cabling). The licensee had previously requested an exemption in this area (Fire Area/Fire Zone 11.3) from full automatic suppression, full automatic detection, and 20 feet separation between redundant components and cabling for redundant safe shutdown equipment. This condition existed from July 17-19, 1989.

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

Corrective Action Taken and Results Achieved

The Fire Marshall immediately removed the acetelyne/oxygen welder's cart from the vicinity, once it was brought to this attention. The Fire Marshal discussed the violation with both maintenance supervisors and the foreman in charge of the specific jobs, and advised them of their responsibilities to prevent future violations.

In addition, written guidance was forwarded through several letters. A July 24, 1989, letter was written to the Department Heads regarding the "The Control of all Flammable/Combustible Compressed Gas Cylinders in Safety Related Areas" to heighten the awareness of the subject concern.

An August 9, 1989, letter was written to the Licensed Shift Supervisors (LSS) regarding "The Control of Transient Flammable and Combustible Materials Including Flammable Compressed Cylinders such as Acetelyne, Hydrogen, etc.". This letter delineated the responsibilities of the LSS, who acts as Fire Chief, regarding control of flammable transient materials within safety related areas.

A September 5, 1989, letter was written to the Security Supervisor regarding "Interim Firewatch Post in Safety Related Areas". This letter required the Security Supervisor to post continuous firewatches in the Unit One Containment and a roving firewatch throughout the Auxiliary Building during the current refueling outage.

These activities have increased the awareness of plant personnel toward control of transient flammable/combustible materials.

Corrective Actions That Will be Taken to Avoid Future Violations

Additional activities that will be taken to prevent future violations include a procedure change to Zion Administrative Procedure (ZAP-04) "Station Housekeeping/Fire Protection". The procedure change will include a tracking method for all transient flammable and combustible materials being transported throughout fire areas in the plant. Additional manpower resources and training will be required to accomplish the implementation of the revised procedure.

Date When Full Compliance Will Be Achieved

Zion Station will be in full compliance by February 1, 1990.