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Docket No. 50-295 Docket No. 50-304

Commonwealth Edison Company ATTN: Mr. Cordell Reed Senior Vice President Post Office Box 767 Chicago, IL 60690

Gentlemen:

This refers to the routine safety inspection conducted by Mr. I. T. Yin and Ms. V. P. Lougheed of this office on September 11 through October 18, 1989, of activities at the Zion Nuclear Power Station, authorized by NRC Operating Licenses No. DPR-39 and No. DPR-48, and to the discussion of our findings with Mr. T. Reick and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report documents our evaluation of your corrective actions conducted for the findings documented in the Region III Safety Systems Outage Modification Inspection (SSOMI) Report No. 50-295/88003. The inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel. The intent of this inspection was to follow up on your corrective actions to the findings from the SSOMI, especially those related to the handling of temporary alterations to the facility and the concerns with installed wiring in the cable trays.

Your handling of the temporary modification program showed some improvement. Safety evaluations, when performed, had significantly improved. However, safety evaluations were still not always being performed when required. Some steps were taken to help identify when safety evaluations were needed, most notably the development of a preliminary safety review form, but implementation has been inadequate in many instances. We are concerned that many station personnel do not understand the requirement nor the intent behind the requirements of 10 CFR 50.59. From the Zion Management Meeting of November 14, 1989, at the Region III office, we understand you are taking steps to revise your procedures regarding 10 CFR 50.59 implementation. In the interim, close management attention to this issue is warranted.

During this inspection, certain of your activities appeared to be in violation of NRC requirements, as stated in the enclosed Notice. A written response is required. The response to the violation of 10 CFR 50.59 should address why these examples are not indicative of a more generic problem in regard to performance of 10 CFR 50.59 evaluations.

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The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

In accordance with 2.790 of the Commission's regulations, a copy of this letter, the enclosure, and your response to this letter will be placed in the NRC Public Document Room.

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We will gladly discuss any questions you have concerning this inspection.

Sincerely,

ORIGINAL SIGNED BY HUBERT J. MILLER

Hubert J. Miller, Director Division of Reactor Safety

Enclosures:

- 1. Notice of Violation
- Inspection Report No. 50-295/89030(DRS); No. 50-304/89030(DRS)

cc w/enclosures: T. J. Maiman, Vice President, FWR Operations T. Kovach, Nuclear Licensing Manager T. Joyce, Station Manager DCD/DCB (RIDS) Licensing Fee Management Branch Resident Inspector, RIII Richard Hubbard J. W. McCaffrey, Chief, Public Utilities Division Mayor, City of Zion Chandu Patel, Project Manager, NRR

