

NOTICE OF VIOLATION

Commonwealth Edison Company
Zion Nuclear Power Station

Docket Nos. 50-295; 50-304
Licenses No. DPR-39; DPR-48

As a result of the inspection conducted from September 11 through October 18, 1989, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1989), the following violations were identified:

1. 10 CFR Part 50, Appendix B, Criterion XVI, states that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management.

Contrary to the above, the following are examples of failures to assure that conditions adverse to quality were promptly identified and corrected:

- a. Instructions to implement corrective measures for deficiencies at cable tray routing points R598 and 1095S were not applicable to the deficiency, resulting in the failure of the deficient conditions to be corrected after identification.
- b. Based on walkdowns of the cable trays which were completed in January 1989, the licensee's contractor had identified 38 conditions where cables with different segregation codes were routed together; however, there was no documentation identifying the cause of the condition, its significance, nor that the condition had been reported to the licensee.
- c. Although the significant deficient condition of reactor coolant pump 2A high vibration had been corrected, the measures taken to preclude repetition were inadequate in that they failed to address the reactor coolant pumps in Unit 1, failed to evaluate the effects of the cause of the deficient condition on the steam generator bumpers, and failed to document the identification of the deficiency.

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

2. 10 CFR 50.59 (b)(1) requires that the licensee shall maintain records of changes in the facility or procedures to the extent that these changes constitute changes in the facility or procedures as described in the safety analysis report. The licensee shall also maintain records of tests which are conducted and are not described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change or test does not involve an unreviewed safety question.

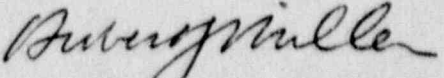
Contrary to the above, the licensee failed to perform written safety evaluations for the following examples where changes were made to the facility or procedures as described in the safety analysis report, or where tests were conducted which were not described in the safety analysis report:

- a. Temporary Alteration 88-022 involved the intentional breaking of the quench line from the Residual Heat Removal pump to the pump seals which resulted in a valve originally installed for normal maintenance becoming the post-LOCA ECCS pressure boundary. The quench line is shown on Figure 9.4.1-1 of the Updated Final Safety Analysis Report (UFSAR), and the performance of this alteration may affect the operations of the RHR pump, which is described in Section 9.4.2.2.2 of the UFSAR.
- b. Procedure Change Request MMSP-89-001 was implemented to allow the performance of a surveillance test of the main steam safety valves while the reactor was at power - a test not described in the UFSAR. Section 13.4.4 of the UFSAR indicated that post-startup surveillance and testing requirements will be as described in the Technical Specifications. For this test, Technical Specification Section 4.7.1 states that ten valves will be tested at each refueling outage. However, the tests actually performed were while the reactor was at power, thereby constituting a test not described in the UFSAR.
- c. Temporary Alteration 89-010 supplied a temporary power feeder from a non-vital electrical source for the heat tracing of the pressure sensing lines from the boric acid transfer pumps. Section 9.2.2.6.35 of the UFSAR described the electrical heat tracing for lines containing highly concentrated boric acid solution, and indicated that these lines were to be powered from vital electrical supplies.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

November 14, 1989
Date


Hubert J. Miller, Director
Division of Reactor Safety