

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-295/89038(DRP); 50-304/89034(DRP)

Docket Nos. 50-295; 50-304

Licenses No. DRP-39; DPR-48

Licensee: Commonwealth Edison Company
P. O. Box 767
Chicago, IL 60690

Facility Name: Zion Nuclear Power Station, Units 1 and 2

Meeting Location: NRC Region III Office, Glen Ellyn, Illinois

Meeting Conducted: November 17, 1989

Type of Meeting: Enforcement Conference

Approved By: *W.D. Shafer*
W. D. Shafer, Chief
Reactor Projects Branch 1

12/07/89
Date

Meeting Summary

Meeting on November 17, 1989 (Reports No. 50-295/89038(DRP);
No. 50-304/89034(DRP))

Subjects Discussed: A discussion relating to the inoperability of the emergency diesel generators (D/Gs) ventilation system, the apparent violation, and the licensee's perspective and corrective actions.

Results: The disposition of the apparent violation associated with D/G inoperability will be presented in subsequent communications.

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1. Enforcement Conference Participates

Commonwealth Edison Company (CECo)

C. Reed	Senior Vice President
K. L. Graesser	General Manager PWR Operations
L. D. DelGeorge	Assistant Vice President, Quality Program and Assessment
T. P. Joyce	Zion Station Manager
G. E. Trzyna	Nuclear Licensing Administrator
T. A. Rieck	Technical Superintendent, Zion
T. J. Kovach	Nuclear Licensing Manager
T. J. Saksefski	Zion Regulatory Assurance
R. J. Squires	Nuclear Safety G.O. Zion
A. J. Ockert	Training Supervisor
D. J. Miller	Regulatory Assurance Supervisor
K. K. Moser	Regulatory Assurance
P. L. Barnes	Performance Improvement
K. A. Ainger	Zion Project Engineer
A. J. Amoroso	Nuclear Engineering
P. LeBlond	Assistant Superintendent Operations, Zion
J. Madden	Technical Staff, Zion
A. M. Polek	Attorney

Nuclear Regulatory Commission

C. J. Paperiello	Deputy Regional Administrator
E. G. Greenman	Director, Division of Reactor Projects
J. A. Grobe	Director of Enforcement
W. D. Shafer	Chief, Branch 1, DRP
J. M. Hirds	Chief, Projects Section 1A
B. A. Berson	Regional Counsel
J. D. Smith	SRI Zion
R. J. Leeman	Resident Inspector-Zion
A. M. Bongiovanni	Resident Inspector-Zion
C. Patel	Project Manager
M. P. Phillips	Chief, Operational Programs Section
C. H. Weil	Enforcement Specialist
D. R. Calhoun	Reactor Engineer
J. A. Holmes	Reactor Engineer

2. Enforcement Conference Details

On November 17, 1989, an enforcement conference was held at the NRC Region III office in Glen Ellyn, Illinois, with the individuals listed above participating. The enforcement conference was a result of an NRC inspection conducted from October 18 through November 6, 1989 (Inspection Reports No. 295/89036(DRP); 304/89032(DRP)).

Discussions at the enforcement conference included: inoperability of the D/Gs as a result of the D/G room ventilation system fans being in pull-to-lock, the apparent violation, and the licensee's corrective actions.

The NRC Region III staff summarized the inspection, apparent violation of regulatory requirements, and other regulatory concerns. The concerns discussed by the Region III staff included an inadequately performed 10 CFR 50.59 review that did not include the Engineered Safety Feature (ESF) functions of providing cooling to the D/G during a Loss-Of-Coolant Accident (LOCA) or loss of off-site power; an incomplete and insufficient review of IN 87-09, "Emergency Diesel Generator Room Cooling Design Deficiency" for applicability at the Zion Station; ineffective corrective actions to address restrictive interpretation of Technical Specifications; and untimely technical support to the operations staff.

The licensee presented a chronology of events, starting before 1980 to the present, on the decision process that was used to determine D/G operability. The licensee has traditionally used only Technical Specifications (TS) to determine operability.

However, the interpretation used by the licensee for determining operability was narrowly scoped; only addressing operability from the aspect that the equipment would run and perform its intended function.

In May 1980, a concern, relating to the ability of the D/G to run without room ventilation, was raised. As a result, a test was conducted and indicated that the D/Gs could run and function as required with no room ventilation at elevated room temperatures. The concern was justifiably removed. In January 1985, a report was written to document the performance of the 1980 test, however, this report and its conclusions have been unattainable. In August 1988, the licensee was informed that an engineering evaluation needed to be performed to establish the operability of the D/Gs when the maximum design room temperatures are exceeded, due to the licensee's inability to locate the 1985 report, which documents verification of D/G operability determination.

In a May 1989, enforcement conference involving the process used for determining operability; the licensee committed to revise, PT-14, an operability surveillance procedure, to include a method for identifying support functions in order to make better operability determinations.

In August 1989, the documentation concern was converted into an operability concern. The Assistant Superintendent of Operations (ASO), through implementing the upgraded PT-14 process, concluded that the D/G room ventilation system was not a necessary support function; therefore, the D/G was determined to be operable. During this determination, the ASO identified a disparity between the FSAR and the TS. In September 1989, an action plan was initiated to re-address the missing documentation concern of the 1980 test. In October 1989, after discussions with the NRC, the D/G room ventilation systems was determined to be a support function; therefore, the D/Gs were declared inoperable.

The licensee also presented an evaluation of the safety significance of operating the D/G without ventilation. The licensee presented an engineering analyses that was performed to prove that the components critical to D/G operation would remain operable at room temperatures in excess of the components maximum rated operating temperatures.

The licensee presented the following corrective actions.

SHORT TERM

- ° Senior Operating Management will review equipment status daily.
- ° Upgraded PT-14 procedure fully implemented by December 1, 1989
- ° Technical staff engineers will review work requests for operability considerations
- ° A matrix will be developed by January 1, 1990, that will identify required support equipment/functions and relate those to the appropriate equipment/Technical Specification section

LONG TERM

- ° A complete matrix will be developed by July 1, 1990.
- ° The inconsistency between the Technical Specification and the FSAR, relative to the D/G ventilation system will be resolved.

3. Conclusion

NRC review of the information presented in the enforcement conference concluded that with the DGs ventilation system fans in pull-to-lock, the D/Gs were inoperable.