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July 29, 1980

Mr. James G. Keppler, Director  
Directorate of Inspection and  
Enforcement - Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Zion Station Units 1 and 2  
Response to I/E Inspection Report  
Nos. 50-295/80-12 and 50-304/80-12  
NRC Docket Nos. 50-295 and 50-304

Reference (a): July 9, 1980 letter from R. F. Heishman  
to C. Reed

Dear Mr. Keppler:

Reference (a) contained the results of an inspection conducted by Messrs. J. E. Kohler and D. E. Miller of your office on March 29 through June 1, 1980 of activities of Zion Station. During this inspection, certain activities appeared to be in noncompliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison Company's response to the items of noncompliance.

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

Very truly yours,

William F. Naughton  
Nuclear Licensing Administrator  
Pressurized Water Reactors

Attachment

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

The items of apparent noncompliance identified in Appendix A of the NRC letter dated July 9, 1980 are responded to in the following paragraphs:

Item 1 Infraction

Technical Specification 3.12.1.C.4.2 states that radioactive gaseous wastes collected in the gas decay tanks shall be held up to a minimum of 45 days before being released except during purge and fill operations associated with refueling and reactor startup.

Contrary to the above, on May 6, 1980, a portion of the contents of gas decay tank 1B was released without being held for 45 days.

Corrective Action Taken and the Results Achieved:

As indicated in the Inspection Report, the major cause of this event was erroneous Hold-Up Tank (HUT) "0" level indication. An information tag has been placed on the HUT "0" level gauge indicating that the tank is empty at a reading of 6%. In addition, the incident has been reviewed with all Radwaste Foremen with the objective of achieving better control over nonroutine operations. In particular, all foremen have been advised to use written temporary procedure changes when performing nonroutine operations not covered by the System Operating Instructions.

Corrective Action To Be Taken to Avoid Further Noncompliance:

The actions that have been taken are sufficient to avoid further noncompliance. In addition, the HUT level instruments will be recalibrated. However, the recalibration has been delayed due to ALARA considerations. Radiation levels of up to 1R/hr. exist near the bottom of the tank due to the water in the tank and crud deposits on the lower tank surfaces. Therefore, it is desirable to delay the recalibration until the HUTs can be individually drained. This has not been possible to date because of the necessity of maintaining HUT availability for Unit 2 startup and power ascension following the refueling outage.

Date When Full Compliance Will Be Achieved:

The Licensee is in full compliance at this time. The HUTs will be drained as operating conditions permit, and the level recalibrations will be completed at that time. December 31, 1980 is the scheduled completion date.

Item 2 Deficiency

Per Reference (a), the inspectors determined that actions had been taken to correct this item and to prevent recurrence. Consequently, no reply to this noncompliance is required.

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