

April 8, 1981

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 IE Inspection Report Nos. 50-295/81-01 and 50-304/81-01

NRC Docket Nos. 50-295/304

Reference (a): March 16, 1981 letter from R. F. Heishman

to C. Reed

Dear Mr. Keppler:

Reference (a) contained the results of inspections conducted by Messrs. J. E. Kohler and J. R. Waters on January 1 through February 27, 1981, of activities at Zion. During that inspection certain activities appeared to be in non-compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation.

To the best of my knowledge and belief the statements contained in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address any questions concerning this matter to this office.

Very truly yours,

Director of Nuclear Licensing

cc: Resident Office - Zion

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Attachment A Response to Notice of Violation

Violation

As a result of the inspection conducted on January 1, 1981 to February 27, 1981, and in accordance with the Interim Enforcement Policy 45 FR 66754 (October 7, 1980), the following violation was identified:

Technical Specification 6.2.A states in part that detailed written procedures shall be prepared, approved and adhered to...

Contrary to the above, Zion Administratove Procedure 10-52-2, Operating Log Books, was violated on February 12, 1981 when nuclear station operator and shift engineer log books did not include an entry regarding significant reactor coolant system leakage that was occurring on Zion Unit 2.

Corrective Action Taken and the Results Achieved:

The week immediately following the Senior Resident Inspector's exit interview, Station Operating management held a meeting with the Shift Engineers to review the events of February 12 and the Inspector's related concerns. At this meeting, the requirements of ZAP 10-52-2, Operating Log Books, were discussed and it was emphasized tht the SE/SF Turnover Checklist was designed to supplement and not to substitute for the information in the Shift Engineer Log.

Operating managment's review of the logs since that meeting has shown that the requirements of ZAP 10-52-2 are being followed.

Corrective Action Taken to Avoid Further Noncompliance:

The content of ZAP 10-52-2, Operating Log Books, has been reviewed and it is current and sufficient.

As regards operator detection of increases in radioactive release rates, the release path monitor recorders are located behind the main control board and, as noted in the Inspection Report, the release on February 12 was well below the alarm setpoint for the applicable monitor. The operator at the controls (at the front of the control board) would check these monitors in response to a front panel alarm. To facilitate detection, Station Operating management has in effect a Standing Order instructing the operator to mark the recorder chart for changes in release rates, including those that do not reach an alarm point. The recorder charts are also reviewed the shift supervision on a random basis during the shift.

Date of Full Compliance:

The licensee is in compliance at the present time.