



Commonwealth Edison

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December 14, 1989

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Zion Station Units 1 and 2
Request for Additional Information
on Generic Letter 83-28
NRC Docket Nos. 50-295 and 50-304

- References: (a) Generic Letter 83-28, dated July 8, 1983.
(b) P.L. Barnes letter to H.R. Denton, dated
November 5, 1983.
(c) P.L. Barnes letter to H.R. Denton, dated
February 29, 1984.
(d) G.E. Trzyna letter to U.S. NRC, dated
August 22, 1988.

Dr. Murley:

Reference (a) requested actions to be taken by licensees and applicants as a result of the Salem anticipated transient without scram events. References (b), (c) and (d) provided Commonwealth Edison Company's (CECO) response to Reference (a). Based on the NRC review of CECO's response, additional information to Section 2.2 (Equipment Classification and Vendor Interface) was requested for Zion Station. The Attachment to this letter presents the additional information requested for Items 2.2.1.1, 2.2.1.2 and 2.2.1.5.

Please direct any questions you may have regarding this matter to this office.

Respectfully,

Milton H. Richter

M.H. Richter

Generic Issues Administrator

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Attachment

cc: A.B. Davis - Regional Administrator, Region III
C. Patel - Project Manager, NRR
Senior Resident Inspector - Zion Station

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ATTACHMENT

2.2 Equipment Classification and Vendor Interface (Programs for All Safety-Related Components)

ITEM 2.2.1.1 IDENTIFICATION CRITERIA

The licensee states that identification criteria are contained in their "Station Nuclear Engineering Quality Procedure Q.12, Exhibits B and C" but did not describe these criteria so that it could be determined that they are equivalent to those contained in the footnote to Item 2.2 of the generic letter. The licensee needs to briefly describe these criteria so the staff can determine that they are equivalent and therefore adequate.

RESPONSE

Commonwealth Edison's initial response to Generic Letter 83-28 (dated November 5, 1983) indicated that Nuclear Stations Engineering Department's (NSED) Quality Procedure Q.12 (Exhibits "B" and "C") contained the criteria for classifying components and parts as safety-related. Since that initial response, NSED's Quality Procedure Q.12 has been deleted and Procedure Q.12.2 for Zion Station was issued. NSED Procedure Q.12.2 establishes the method for the classification and listing of components in safety-related structures and systems, and ASME Section III components. Exhibit "B" of Procedure Q.12.2 delineates the criteria used to classify components of safety-related systems. This exhibit requires all components which ensure the safety function of a system to be classified as safety-related. The approach utilized in Procedure Q.12.2 (Exhibit "B") to classify components is consistent with the approach previously described for Procedure Q.12 (November 5, 1983 response). Classification of parts (previously performed utilizing Exhibit "C" of Procedure Q.12) are conducted by the stations and are reviewed by the Nuclear Engineering Department as specified in NSED Procedure Q.48 (Review and Verification of Parts Classification Performed at a Nuclear Power Station).

At this time, NSED Procedure Q.12.2 is being revised to include a definition of safety-related equipment as that equipment which ensures; the integrity of the reactor coolant pressure boundary, the capability to shutdown the reactor and maintain it in a safety shutdown condition, or the capability to limit potential offsite exposures to the guidelines of 10 CFR Part 100. This definition conforms with the definition for safety-related equipment contained in the footnote of Item 2.2 of Generic Letter 83-28. It is expected that this revision to Procedure Q.12.2 will be completed by the end of February 1990 (note, the revision of Q.12.2 will change the procedure number to ENC-QE-12.2 to reflect a recent company reorganization).

ITEM 2.2.1.2 - INFORMATION HANDLING SYSTEM

The licensee's response indicates that the multiple lists of safety-related equipment exist which comprise the information handling system. The response did not indicate how these lists are controlled, validated, maintained, and coordinated so as to provide a single source of controlled and coordinated classification information for use by the station personnel. The licensee needs to provide this information for staff review.

RESPONSE

At this time, the Piping and Instrument Drawings, Equipment List, and Instrument Index define the safety-related and ASME Section III equipment and components for Zion Station. These documents are procedurally controlled (and maintained) by the Nuclear Engineering Department (PWR Systems Design Group), and distributed in accordance with a controlled distribution list. Upon receipt of any revisions to the documents listed above, the station updates controlled copies of these documents in accordance with station procedures.

Commonwealth Edison Company has recently developed a computerized Safety-Related Classification List (SRCL). The SRCL, compiled from the sources described above, provides a single listing of components classified as safety-related or ASME Section III. Further enhancements to the SRCL will be made as warranted, and is considered an "on-going" project. The Nuclear Engineering Department (PWR System Design Group) is responsible for preparation, validation, maintenance, and periodic distributions of the SRCL in accordance with NSED Quality Procedure Q.12.2 (note, the methodology for control of the SRCL presently exists in Quality Procedure Q.12.2). The PWR Systems Design Group will be required to update and issue the SRCL via a controlled distribution list. Access to update the SRCL will be restricted via a computer password and one individual will be responsible for updating. At this time, the administrative controls for station distribution and use of the SRCL are being determined for implementation by January 31, 1990.

ITEM 2.2.1.5 - DESIGN VERIFICATION AND PROCUREMENT

The licensee's response addresses this item satisfactorily, however, in the response to Item 2.2.1.3 it is stated that "Commercial Grade parts must be evaluated and tested for use in safety-related systems per station procedures and Corporate Quality Assurance Manuals." It is not clear that these "tests and evaluations" will assure that these Commercial Grade parts will meet the design verification and qualification testing requirements for safety-related components. The licensee needs to confirm that such components are verified to meet the design requirements and the environmental and seismic testing requirements imposed on safety-related components.

RESPONSE

Zion Administrative Procedures 4-51-1 and 3-51-6 presently establish procurement requirements, and require performance of technical evaluations, on commercial grade parts for application to safety-related components. The evaluation of the part addresses design and qualification (i.e., environmental and seismic) requirements. Post maintenance, and periodic surveillance, testing of the safety-related component with the dedicated part installed provides assurance that the component will be able to perform its intended function.

Commonwealth Edison Company (CECo) recently completed a corporate review on commercial grade procurement practices. As a result of this review, a corporate directive (NOD-TS.10, Procedures for the Procurement and Use of Items for Repairs and Replacement of Safety-Related Equipment) was issued to the CECo nuclear stations to provide guidance in this area. The Corporate Directive was generated from the guidance presented in EPRI/NCIG 07 (Guidelines for the Procurement of Commercial Grade Items for Safety-Related Use), and CECo's past and present procurement practices. Zion Station will review the guidance provided in the directive and initiate the necessary procedure revisions to ensure conformance by December 31, 1989.