

OCT 12 1990

Docket No. 50-295
Docket No. 50-304

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Senior Vice President
Licensing Department-Suite 300
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Gentlemen:

- References:
- (a) Confirmatory Action Letter (CAL) RIII-90-011, Dated June 22, 1990
 - (b) Commonwealth Edison Response to Items a. - d. of CAL-RIII-90-011, Dated June 26, 1990
 - (c) Commonwealth Edison Additional Response to Item d. of CAL-RIII-90-011, Dated October 5, 1990
 - (d) Commonwealth Edison Supplementary Response to Items a. - d. and Initial Response to Item e. of CAL-RIII-90-011, Dated July 6, 1990
 - (e) Commonwealth Edison Response to Item e. of CAL-RIII-90-011, Dated August 31, 1990

During the week of June 18, 1990, a special regional inspection was conducted at the Zion Station as a followup of the findings of an NRC Diagnostic Evaluation Team (DET) that was being conducted at the same time. The findings indicated there was reasonable cause to question the validity of torque switch settings on safety-related MOVs in Unit 1, which was operating, and in Unit 2, which was shut down. As a result of this condition, a Confirmatory Action Letter (CAL) was written on June 22, 1990. This CAL (Reference (a)) identified the following actions that you agreed to perform:

- a. For Unit 1, which was operating, confirm that all of the MOVs discussed in NRC Bulletin (IEB) 85-03 were operable or follow the appropriate Technical Specification action statement requirements.
- b. For the operability determination of Item a. above, base any conclusion which used torque switch settings to determine operability on settings which have been physically verified in the plant or provide justification as to why this is not necessary.

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- c. For MOVs whose operability determination was based on a plant or equipment operating configuration, provide controls (procedure, standing order, etc.) which will ensure that the configuration will not be inadvertently disturbed.
- d. For the shutdown unit, Unit 2, confirm that all IEB 85-03 MOVs have their torque switch settings verified correct prior to returning Unit 2 to service (before entering Mode 2).
- e. Perform a re-evaluation of Commonwealth Edison's IEB 85-03 submittal for Zion Station to determine if any retesting or resubmittal is necessary.

The CAL indicated that you would complete the actions of Items (a) through (c) and document them in a letter to Region III by June 26, 1990. This letter was to include a listing of each valve, a brief description of its function, and its operability determination. It also indicated that you would provide expected completion dates for Items (d) and (e) and your program and schedule addressing potential discrepancies with other safety-related MOVs at Zion by July 6, 1990. In accordance with the schedule of the CAL, your letter of June 26, 1990 (Reference (b)), confirmed the operability of Unit 1 MOVs as prescribed in the CAL, provided a program for the completion of item (d) and a date for the expected completion date for item (e). The letter also confirmed that all Unit 2 IEB 85-03 MOVs would have their torque switches verified correct prior to entering Mode 2. The letter stated that all but five MOVs had been verified and that these would be verified at plant conditions that were less susceptible to the loss of Reactor Coolant Pump seal injection. The verification of the final five MOVs (confirmed in Reference (c)) fulfilled the requirement of Item d.

Your letter of July 6, 1990 (Reference (d)), provided supplementary information for Items a. - d., programs and schedules to address potential discrepancies for all safety-related MOVs and your initial response to Item e.

Your letter of August 31, 1990, (Reference (e)) confirmed a re-evaluation of your IEB 85-03 submittal and concluded that the values previously transmitted to the NRC were correct with the exception of the calculated maximum accident differential pressures for the Auxiliary Feedwater (AFW) Service Water Suction MOVs and the AFW Discharge MOVs. The corrections were noted for specific valves in the letter, a copy of which was transmitted to the project manager at NRR, effectively completing Item e.

We understand that you intend to continue applying the additional torque switch setting control measures that were applied as a

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result of the CAL until the conversion to the MOV analysis system makes such measures unnecessary.

Based on a review of your corrective actions, I believe that you have made adequate progress on your plans and commitments for final resolution of this matter and hereby terminate this CAL.

Sincerely,

Original signed by
A. Bert Davis

A. Bert Davis
Regional Administrator

- cc: M. J. Wallace, Vice President, PWR Operations
- T. Kovach, Nuclear Licensing Manager
- T. Joyce, Station Manager
- R. Chrzanowski, Regulatory Assurance Supervisor
- DCD/DCB (RIDS)
- OC/LFDCB
- C. Patel, LPM, NRR
- Resident Inspectors-Byron, Braidwood, Zion
- Richard Hubbard
- Mayor, City of Zion
- J. W. McCaffrey, Chief Public Utilities Division
- Robert Newmann, Office of Public Counsel, State of Illinois Center
- J. Taylor, EDO
- H. Thompson, OEDO
- J. Sniezek, OEDO
- J. Clifford, OEDO
- J. Lieberman, OE
- J. Goldberg, OGC
- J. Partlow, NRR

RIII <i>LSH</i> Smith/jk 10/09/90	RIII <i>LSH</i> Danielson 10/9/90	RIII <i>JK</i> Ring 10/9/90	RIII <i>WJ</i> Shafer 10/09/90	RIII <i>WJ</i> Farber 10/09/90	RIII <i>WJ</i> Greenman 10/09/90
RIII <i>AM</i> Martin 10/9/90	RIII <i>AM</i> Miller 10/10/90	RIII <i>CP</i> Pederson 10/10/90	NRR <i>LSH</i> Zwolinski 10/11/90 <i>per Telcom w/R. Barrett</i>	RIII <i>CP</i> Paperiello 10/11/90	RIII <i>yes</i> Davis 10/12/90