

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-295/82-17; 50-304/82-15(DPRP)

Docket Nos. 50-295; 50-304

Licenses No. DPR-39; DPR-48

Licensee: Commonwealth Edison Company  
Post Office Box 767  
Chicago, IL 60690

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

Meeting At: U.S. Nuclear Regulatory Commission  
Region III Office  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Meeting Conducted: July 21, 1982

Meeting Attendees: *ABD*  
A. B. Davis, Deputy  
Regional Administrator

*8/30/82*

*RC Knop*  
R. C. Knop, Chief  
Projects Branch 1

*8-27-82*

*RC Knop for*  
D. W. Hayes, Chief  
Reactor Projects Section 1B

*8-27-82*

J. M. Hinds, Project Inspector  
Section 1B

*RC Knop for*  
J. R. Waters, Senior Resident  
Inspector, Zion Station

*8-27-82*

*RC Knop for*  
D. L. Wigginton, Project Manager  
Nuclear Reactors Regulation

*8-27-82*

Approved By: *R. L. Spessard*  
R. L. Spessard, Director  
Division of Project and  
Resident Programs

*8/27/82*

Meeting Summary

Enforcement Conference on July 21, 1982 (Report Nos. 50-295/82-17(DPRP);  
50-304/82-15(DPRP))

Subjects Discussed: Start up of Unit 2 Reactor with O Diesel Generator out of service and the exclusion of deleterious material from reactor plant systems.

## DETAILS

### 1. Meeting Attendees

#### Commonwealth Edison

K. L. Graesser, Zion Station Superintendent  
F. G. Lentine, CECo Nuclear Licensing Administrator  
E. T. Fuerst, Zion Station Assistant Superintendent for Operations  
D. P. Galle, CECo Division Manager  
L. O. DelGeorge, CECo Director of Nuclear Licensing  
W. L. Stiede, CECo Assistant Vice President for Licensing and Engineering

#### U.S. Nuclear Regulatory Commission

A. B. Davis, Deputy Regional Administrator  
R. L. Spessard, Director, Division of Project and Resident Programs  
R. C. Knop, Chief, Projects Branch 1  
D. W. Hayes, Chief, Reactor Projects Section 1B  
J. M. Hinds, Project Inspector, Section 1B  
J. R. Waters, Senior Resident Inspector, Zion Station  
D. L. Wigginton, Project Manager Nuclear Reactors Regulation

2. On July 21, 1982, an enforcement conference was held with the Commonwealth Edison representatives denoted in Paragraph 1. The purpose of the conference was to discuss two issues: The start up of Unit 2 with the 0 Diesel Generator out of service, and the exclusion of deleterious material from reactor plant systems. A summary of the discussions and findings is presented below.
- a. On June 28, 1982, Unit 2 reactor was made critical with the 0 Diesel Generator out of service. (details of the occurrence are documented in Reports No. 50-295/82-14(DPRP); 50-304/82-13(DPRP)). The licensee maintains that the start up was allowable under Technical Specification 3.15.2. This section permits recovery from an inadvertent trip with certain power supplies (including the 0 Diesel Generator) out of service. The licensee considers that the definition of inadvertent trip includes all reactor trips not associated with primary plant parameters. The licensee further maintains that this has been the accepted definition of inadvertent trip at Zion. They cited several examples where a reactor was made critical with components out of service under their definition of inadvertent trip. The licensee also provided a list of components that may be out of service per Technical Specifications when recovering from an inadvertent trip. Some of the components have relatively minor safety significance and the licensee considers that start up should be allowed with the minor components out of service regardless of the source of the reactor trip.

The NRC position on this issue is that based on the wording in the Technical Specification, a trip resulting from a valid protection system action regardless of whether it originates from primary or secondary systems is not inadvertent. Additionally, a recovery from inadvertent trip was not intended to include a period of several days during which the plant was taken to cold shutdown, as was the case in the June 28, 1982, occurrence. Prior to the enforcement conference Region III considered the start up of June 28, 1982, as warranting a Severity Level III noncompliance with possible escalated enforcement action. After considering the possible confusion caused by the wording of the application of the inadvertent trip clause in the Technical Specifications, Region III reduced the severity level of the non-compliance to level IV. Additionally, the licensee has committed via a July 23, 1982, letter from F. G. Lentine to develop a mutually acceptable interpretation of "recovery from inadvertent trip" or to submit a Technical Specification change to the NRC.

- b. In January of 1981, while performing steam generator tube inspection an aluminum nozzle cover was inadvertently left in a steam generator hot leg plenum. In May of 1982, during repairs to a loop stop valve a piece of broken valve guide could not be accounted for. On June 2, 1982, a safety injection pump shaft broke due to a one inch diameter stud in the pump section. Details of these occurrences are documented in Inspection Reports No. 50-295/82-08; 50-295/82-14; 50-304/82-13.

These occurrences caused concern about the licensee's ability to effectively exclude foreign objects from reactor plant systems. The circumstances and licensee actions pertaining to these events were discussed. A Severity Level IV citation had been previously issued concerning the nozzle cover left in the steam generator. Regarding the stud found in the safety injection pump, the origin of the stud could not be established and no further action was taken. Concerning the missing piece of broken valve guide, no grounds for enforcement action were found. Minor procedural inconsistencies were identified after the enforcement conference. These have been addressed or resolved by the licensee.