



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 10, 1990

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

Attn. Document Control Desk

Subject: Zion Station Units 1 and 2
NuReg 0737, I.C.6, Verification
NRC Docket Nos. 50-295 and 50-304

- References: (a) December 15, 1980, letter from J.S. Abel
to D.G. Eisenhut
(b) January 12, 1982, letter from S.A. Varga
to L.O. DelGeorge

Dear Dr. Murley:

The Commonwealth Edison Zion Station response to NUREG 0737 Item I.C.6, regarding verification of correct performance of operating activities was submitted in reference (a) with approval in the Safety Evaluation Report documented in reference (b). In that submittal Zion committed to utilize an SRO Licensed individual to perform the verification requirement. To satisfy this commitment, one of the two licensed shift foreman performs the verification of out-of-service and return to service valve and breaker positions throughout the facility.

To enable the shift foreman to spend a greater percentage of time performing supervisory duties, Commonwealth Edison is proposing to utilize persons not licensed who complete a training qualification program and are therefore considered "Qualified" to implement action to take equipment out-of-service and return to service as well as to perform valve line-ups. After equipment is removed or returned to service, correct alignment of equipment, valves, and switches will be accomplished by either use of functional testing, use of the second qualified operator, or the use of the automatic system status monitoring system.

Procedures will be put in place to ensure that the independent verification of safety related equipment is performed utilizing qualified personnel. Zion Station is planning on implementing this change on August 14, 1990. The implementation of this change will not remove the responsibility of the SRO Licensed Operator from authorizing the equipment to be taken out-of-service, or approving Temporary Alterations. This change will bring Zion Station in line with the other Commonwealth Edison Stations in the area of utilizing a second qualified individual to perform independent verification.

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

Very truly yours,

R. A. Chrzanowski
Nuclear Licensing Administrator

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cc: C. Patel - NRR
Zion Station Manager
Region III Office

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