



**Commonwealth Edison**

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Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

December 2, 1982

Mr. James G. Keppler, Regional Administrator  
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 I.E. Inspection  
Report Nos. 50-295/82-22 and  
50-304/82-19  
NRC Docket Nos. 50-295 and 50-304

Reference (a): November 5, 1982, letter from  
R. L. Spessard to Cordell Reed.

Dear Mr. Keppler:

Reference (a) contained the results of an inspection conducted by Messrs. J. R. Waters, F. Dunaway, and P. Hartman of your office on September 1, and October 15, 1982, of activities at Zion Station. During that inspection certain activities appeared to be in noncompliance with NRC requirements. The Attachment to this letter provides 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 questions regarding this matter to this office.

Very truly yours,

L. O. DelGeorge  
Director of Nuclear Licensing

FGL/lm

Attachment

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ATTACHMENT

COMMONWEALTH EDISON COMPANY

ZION STATION UNITS 1 and 2

RESPONSE TO NOTICE OF VIOLATION

Item of Noncompliance

Zion Technical Specification 3.9.4.d states: "Positive reactivity changes shall not be made by boron dilution when the containment integrity is not intact unless the reactor is maintained subcritical by at least 10%  $\Delta$  K/K."

Corrective Action Taken and Results Achieved

When the condition was discovered, the shutdown margin was increased to above 10% by boration. The operator on duty at the time of the occurrence has been reinstructed on the Technical Specification requirements on containment integrity.

Corrective Action Taken to Avoid Further Noncompliance

Procedure changes have been made to re-emphasize the requirements of Technical Specification 3.9.5.d. Changes have been made to the shutdown margin verification procedure (contained in the PT-0 Shift Surveillance procedure) highlighting the requirement to maintain containment integrity. A statement of this requirement has been placed on the procedure page on which shutdown margin is plotted as a function of time.

Date of Full Compliance

Full compliance has been achieved.