



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

March 31, 1994

U. S. Nuclear Regulatory Commission  
Washington, D. C. 20005

Attention: Document Control Desk

Subject: Zion Nuclear Power Station Units 1 and 2  
Supplemental Response to NRC Inspection Report  
Nos. 50-295(304)/93014  
NRC Docket Nos. 50-295 and 50-304

- References:
- (a) J.B. Martin letter to M.J. Wallace dated September 9, 1993 transmitting Notice of Violation (NOV) and Proposed Imposition of Civil Penalty - \$50,000.
  - (b) D. Farrar letter to the U.S. NRC Director, Office of Enforcement dated October 12, 1993 transmitting Commonwealth Edison response to Notice of Violation and Civil Penalty.

Reference (a) transmitted the subject inspection report and identified a severity level III violation with civil penalty and four severity level IV violations. The civil penalty has been paid. Commonwealth Edison's (CECo) response to the NOV was provided in reference (b). One of the severity level IV violations, cited against 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings", contained three examples. One of the three examples involved a failure to prescribe by procedure, as described in the Zion UFSAR, that Auxiliary Building door L-10 be designated a normally closed door to protect safety related equipment against loss of function due to flooding. In response to this violation, CECo committed to develop and implement an administrative procedure to identify and provide controls for both flood boundary and ventilation boundary doors. CECo committed to having this procedure completed by March 31, 1994.

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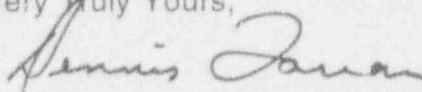
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The procedure for control of flood and ventilation boundary doors has been developed. As of this date however, the procedure has not been implemented. Efforts to validate the procedure determined that the new procedure due to its comprehensive scope to include both ventilation and flood boundaries also served, in some cases, radiation and fire protection boundaries. In order to address these multi-function boundary doors, the procedure requires additional changes to properly coordinate and integrate control requirements with other procedures. Although the procedure changes could have been completed by the commitment date, implementation of these procedures could not. Additional time is required to ensure that all necessary personnel are properly trained on the procedure's requirements prior to its implementation. Accordingly, CECo is notifying the NRC that the commitment date for implementation of this administrative procedure and attainment of full compliance is being revised to May 15, 1994.

If your staff has any questions or comments concerning this letter, please refer them to Marcia A. Jackson, Regulatory Performance Administrator at (708) 663-7287.

Very Truly Yours,



Dennis Farrar, Manager  
Regulatory Services

cc: J. B. Martin, Regional Administrator, RIII  
C. Shiraki, Project Manager, NRR  
J. D. Smith, Senior Resident Inspector, Zion Station