



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

September 17, 1990

Mr. A. Bert Davis  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Zion Station Units 1 and 2  
Response to Notice of Violation  
Contained in Inspection Report  
50-295/90013 & 50-304/90015  
NRC Docket Nos. 50-295 and 50-304

Reference: W.D. Shafer to Cordell Reed letter  
dated August 9, 1990

Dear Mr. Davis:

The referenced letter transmitted Inspection Report 50-295/90013 and 50-304/90015 which contained one Notice of Violation. The attachment to this letter provides the detailed response to the violation.

During our review of the event, we concluded that the procedure in question was followed as written. The administrative procedure requires an analysis to be completed within 14 days for diesel fuel oil received from suppliers not on the Commonwealth Edison approved bidders list. The diesel fuel oil shipment in question was received from an approved supplier and had a Certificate of Conformance. The receipt inspection and analysis was performed with the approved Station procedure.

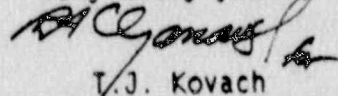
Zion Station did identify improvements that are needed in the sampling and analysis of diesel fuel oil prior to use at the Station. These will be implemented in the near future.

We request that you evaluate our response and reconsider the Notice of Violation.

An extension to the response due date was requested on August 20, 1990 and granted by W. Shafer to the Region III staff.

If there are any questions or comments to this response, please direct them to R. Chrzanowski at (708) 515-7275.

Very truly yours,



T.J. Kovach  
Nuclear Licensing Manager

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cc: Document Control Desk  
C. Patel-Project Manager-NRR  
J. Smith-Senior Resident Inspector

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## RESPONSE TO NOTICE OF VIOLATION

50-295/90013-04

50-304/90015-02

10 CFR 50, Appendix B, Criterion V, as described in Section 5 of Topical Report CE-IA, Revision 55, and as implemented by the Zion Quality Assurance Manual, Section 5, requires that activities affecting quality be prescribed by documented instructions, procedures, and drawings, and that those activities be accomplished in accordance with those instructions, procedures and drawings.

Technical Specification 6.2.1 states, in part, that written procedures shall be prepared, implemented and maintained for normal startup, operation and shutdown of the reactor and other systems and components involving nuclear safety of the facility.

Contrary to the above:

On June 20, 1990, samples were taken from a shipment of diesel fuel oil. Zion Administrative Procedure 13-52-9, "Visual Inspection for Receiving Diesel Fuel Oil," requires that the analysis of properties of the fuel oil listed in ASTM-D975 be completed within fourteen days. The samples were sent to the laboratory on July 5 and the analysis was received on July 13, twenty-two days after the samples were taken.

This is a Severity Level IV violation (Supplement I).

### DISCUSSION

Commonwealth Edison has reviewed the events surrounding the receipt and sampling of the June 20, 1990 diesel fuel oil shipment.

Zion Station procured the fuel oil shipment safety-related, commercial-grade from a vendor on the Commonwealth Edison approved bidder's list who supplied a Certificate of Conformance to ASTM-D-975.

Zion Station performed the receiving inspection required by Zion Administrative Procedure (ZAP) 13-52-9, "Visual Inspection for Receiving Diesel Fuel Oil", revision 2 dated January 13, 1988. The Receipt Inspection consisted of verifying the vendor had provided certification that the diesel fuel met the requirements of ASTM-D-975 and ILEPA 0.28% maximum sulfur content. The inspection also consisted of a visual inspection to the stated acceptance criteria. This receipt inspection was satisfactorily completed prior to placing the diesel fuel oil in the storage tank.

ZAP 13-52-9 provides a precaution for receipt of diesel fuel from supplier's not on the Commonwealth Edison approved bidder's list. This precaution states, in part, that "Analysis of other properties of the fuel oil listed in ASTM-D-975 should be completed within 2 weeks of the addition". For fuel oil supplied by a vendor on the Commonwealth Edison approved bidder's list a sample and analysis is required, however, no time constraint is set for completion of the analysis. Since the diesel fuel received in this particular shipment was supplied by an approved vendor the precaution did not apply.

Our review concluded that procedure ZAP 13-52-9 was followed for receipt inspection and analysis of diesel fuel oil supplied by an approved vendor. Consequently, no violation occurred.

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ACTIONS TAKEN:

CECo's review of the event did reveal that improvements are needed in the sampling and analysis of diesel fuel oil prior to use at Zion Station.

It was identified that certain analyses (eg. API gravity, water sediment, visual inspection) are prudent and required by Technical Specifications of more recently licensed power plants (eg. Byron and Braidwood) prior to use. While not required by the Zion Technical Specifications, these analyses will be instituted as soon as the necessary analytical equipment can be procured. This is expected by December 31, 1990.

It was also determined that a more effective method was needed to obtain a representative sample from a fuel oil truck. A review is being conducted to identify a more effective sampling method. This review will be completed by October 30, 1990. Pending implementation of a revised sampling method, a "Bacon" sample bomb or equivalent bottom sampler will be utilized to improve our ability to obtain a representative sample.