



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

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November 30, 1990

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

Subject: Zion Station Units 1 and 2
Response to Notices of Violation
I.R. No. 295/90022 and 304/90024
NRC Docket Nos. 50-295 and 50-304

Reference: (a) L. Greger letter to C. Reed dated
October 31, 1990.

Dear Sir:

This letter is in response to the NRC routine safety inspection conducted by Messrs. W. Grant and A. Markely of your office during the period of September 24 through October 12, 1990 of activities at the Zion Nuclear Power Station. Reference (a) indicated that certain activities appeared to be in violation of NRC requirements. The Commonwealth Edison Company response to these three Notices of Violation are provided in the Enclosure.

If you have any further questions on these matters, please direct them to this office.

Very truly yours,

P.C. Zolan
Nuclear Licensing Department

PZ:lmw
ZNLD646

Enclosure

cc: Senior Resident Inspector - Zion
NRC Document Control Desk

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ENCLOSURE

COMMONWEALTH EDISON COMPANY
RESPONSE TO NRC INSPECTION REPORT
NOS. 50-295/90022 and 50-304/90024

Violation 295/90022-01 and 304/90024-01:
Unapproved Temporary Procedure Change

Technical Specifications 6.2.4 requires that temporary changes to procedures be approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License and that the change is documented, reviewed by the On-Site Review and Investigative function and approved by the Station Manager or designee within 14 days of implementation.

Contrary to the above, on May 30, 1990, a temporary change was made to Zion procedure ZTLDP 1100-3, TLD Qualification Card Completion, by an individual from the corporate health physics group. The change was not documented and reviewed by the On-Site Review and Investigative function nor were requisite approvals obtained as prescribed.

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

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Commonwealth Edison acknowledges that a violation of the temporary procedure change requirements did occur. The change to the procedure was not reviewed and approved by the required station review per Zion Administrative Procedure (ZAP) 5-51-4.

To correct the immediate concern the change to ZTLDP 1100-3 was formally processed in accordance with approved Station procedures. This review found that the procedure, as originally revised, was acceptable. Additionally, the Zion Station individual involved with this incident was counseled on the proper method for processing procedure changes, as was the involved Corporate Health Physics individual.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

As described in the inspection report, Zion had previously experienced a problem with unapproved temporary procedure changes to a procedure. This past problem was documented as a non-cited violation in Inspection Report 50-295/90015 (DRSS); 50-304/90017 (DRSS), and involved minor changes to a calibration procedure that did not alter the intent of the procedure.

Because there are now two examples of not properly processing and obtaining approvals for temporary procedure changes, all Zion Station departments will be required to review this violation and the associated response with members of their departments. This review will be completed by January 31, 1991.

The Corporate Health Physics Department will also review this violation and the associated response with all members of the department to highlight that changes to any station procedures must be reviewed and approved prior to implementation. This review will be completed during December 1990.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station and Corporate Health Physics will be in full compliance by February 1, 1991.

Violation 295/90022-05 and 304/90024-05:
LER Not Submitted As Required

Technical Specification 6.6.2.B requires that a Licensee Event Report be submitted to the NRC within 30 days after discovery of any operation or condition prohibited by Technical Specifications.

Technical Specification 3.12, Table 3.12-1, Action 7 requires with less than the minimum number of operable channels and no redundant monitor operable in this flow path, immediately suspend purging of radioactive effluents via this pathway.

Contrary to the above, the licensee failed to submit a Licensee Event Report within 30 days after discovery of reactor head venting via the purge exhaust system without the minimum number of required channels operable and with no redundant monitor operable in this flow path. The dates of discovery were April 10 and 11, 1990.

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

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Commonwealth Edison acknowledges the violation.

As discussed in the inspection report Zion Station submitted a "voluntary" LER on October 4, 1990. To address this concern the LER has been reevaluated and classified as reportable under 10CFR50.73 (A)(2)(i)(B) and was re-submitted on November 29, 1990.

This event was initially reported via an ENS phone call under the requirements of 10CFR50.72(b)(2)(iii)(c). This paragraph requires notification of the NRC within 4 hours of "Any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material." This paragraph was later determined by Zion Station not to apply to this situation, and thus the phone call was rescinded. After further discussions with the NRC, the phone call was reinstated for information only. The discussions surrounding the reportability of this event under this paragraph and the corresponding paragraph in the LER rule resulted in a focussed attention on these paragraphs, and limited the consideration for reportability under other criteria. Thus the reportability of this event as a Technical Specification violation was not adequately reviewed. A contributing cause is the inherent difficulty in interpreting Zion Station's custom Technical Specifications in this situation, as it is not obvious from Technical Specifications that a head vent is equivalent to a containment purge.

CORRECTIVE ACTION TO BE TAKEN TO PREVENT RECURRENCE

The primary responsibility for classification of events as reportable or non-reportable rests with the Operating Engineers. The initial classification is reviewed by the DVR Coordinator and the LER Coordinator, both of whom work in the station Regulatory Assurance Department. These individuals are the station personnel most familiar with LER reporting requirements. The results of this review are then discussed at the morning 'Root Cause' meeting in which Regulatory Assurance personnel discuss all events that have occurred at the plant in the previous twenty four hours. This system has worked reliably in the past. To strengthen this process in the future, the Operating Engineers will be provided with a copy of NUREG 1022 and both supplements, and be further familiarized with the contents of these documents. This will ensure that both the initial classification and subsequent review are equally thorough.

Additionally, this LER will be reviewed by the Regulatory Assurance Department, and included in a required reading package for all license holders at Zion Station. The increased sensitivity gained from these two actions will reduce the potential for recurrence of this type of event.

System Operating Instruction (SOI) SOI-9 "Containment Ventilation" and Zion Chemistry Procedure (ZCP) ZCP-304 "Documentation of Containment Radioactive Releases" will be revised to require that 1(2)RT-PRO9 are operable during reactor head vent activities. These procedure revisions will be completed by February 28, 1991.

Technical Specification requirements for other radioactive releases are clearer, thus no additional procedural changes are contemplated.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The station Operating Engineers will be provided copies of NUREG 1022 and both supplements, and be familiarized with their contents by December 31, 1990.

The Regulatory Assurance review of this LER will be completed in December 1990.

The LER will be included in the January 1991 required reading package for all license holders.

The System Operating Instruction SOI-109 "Containment Ventilation" and Zion Chemistry Procedure ZCP-304 "Documentation of Containment Radioactive Releases" will be revised by February 28, 1991.

Therefore, Zion Station will be in full compliance by February 28, 1991.

Violation 295/90022-06 and 304/90024-06:
Contaminated Area Posting and Barricading

Technical Specifications 6.2.2 requires that radiation control procedures shall be prepared, implemented and maintained.

Zion procedure ZRP 1101-12, "Radiological Postings, Labels, Indicators and Their Use", requires posting and barricading of contaminated areas.

Contrary to the above, an unposted and unbarricaded contaminated area was found near the OB lake discharge pump. In addition, the 1B and 1C charging pump rooms and the 2B safety injection pump room were found without contaminated area postings. These latter three areas were contaminated, but appropriately barricaded.

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

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Commonwealth Edison acknowledges the violation.

As noted in the inspection report, the unposted and unbarricaded contaminated area near the OB lake discharge pump was properly posted and barricaded prior to the completion of the inspection. The 1B and 1C charging pump rooms and the 2B safety injection pump room were also properly posted prior to the end of the inspection.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

On September 28, 1990 Zion Station issued a memorandum to all Radiation Protection personnel which instituted controls that require the presence of a Radiation Protection Technician at the site of any area to be set up as a controlled area or which is being released from a controlled status. The Radiation Protection Technician is responsible to ensure the area is posted and controlled in accordance with procedure. The appropriate Radiation Protection procedures will be revised to reflect the controls provided in the September 28, 1990 memorandum. This will be completed by February 28, 1991. Zion Station believes these controls will prevent recurrence.

In addition, the Radiation Technicians will receive reinforcement on the need to perform contamination surveys at contamination boundaries during routine surveys. This reinforcement will be provided at a department weekly meeting by January 1, 1991. These two actions should help reduce the number of personnel contaminations at the station.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station will be in full compliance by February 28, 1991.