



Commonwealth Edison

Zion Generating Station
Shiloh Blvd. & Lake Michigan
Zion, Illinois 60099
Telephone 708 / 746-2084

December 10, 1990

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Dear Sir:

The enclosed Licensee Event Report number 90-012-00, Docket No. 50-304/DPR-48 from Zion Generating Station is being transmitted to you in accordance with the requirements of 10CFR50.73(a)(2)(i), which requires a 30 day written report when there has been a condition prohibited by the plant's Technical Specifications.

Very truly yours,

T. P. Joyce

for T. P. Joyce
Station Manager
Zion Generating Station

TPJ/dmg

Enclosure: Licensee Event Report

cc: NRC Region III Administrator
NRC Region Resident Inspector
INPO Record Center
CECo Distribution List

1110D

000200

9012140004 901209
PDR ADOCK 05000304
S PIC

IE22
41

LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) Zion Unit 2
 Docket Number (2) 0 5 10 10 10 3 10 14
 Page (3) 1 of 0 3
 Title (4)

Violation of Tech Spec Action Statement Due to Personnel Error

Event Date (5)			LER Number (6)			Report Date (7)			Other Facilities Involved (8)	
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names	Docket Number(s)
1	17	9	9	0 1 12	0 1 0	1	2	0	N/A	

OPERATING MODE (9) 3
 POWER LEVEL (10) 0 0 0
 THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> Other (Specify in Abstract below and in Text)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

Name: John H. Windiate, F.P. Engineer, ext. 3108
 TELEPHONE NUMBER: AREA CODE 7 0 8, 7 4 6, -13 1 10 8

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS
				N					

SUPPLEMENTAL REPORT EXPECTED (14)

Expected Submission Date (15) X | NO
 Yes (If yes, complete EXPECTED SUBMISSION DATE)

ABSTRACT (Limit to 1400 spaces, i.e. approximately fifteen single-space typewritten lines) (16)

On 10/17/90, during TSSP-96-89 (Damper Drop Test) a fire damper was found inoperable and required compliance with Technical Specification Section 3.21.6.B. The action statement to this Technical Specification had two parts and compliance with either depended on the existence or/non-existence of fire detection means in the area the damper was to isolate. The engineer performing the test was in a different room when reporting the existence of a detection loop. Consequently, a one hour inspection was initiated instead of the required continuous fire watch. The safety significance of the inoperable damper was minimal because system design would have inhibited any spread of a fire starting in the room. Corrective actions include stressing the importance of verification and a confirmatory approach to be taken while performing your job.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)				Page (3)		
		Year	Sequential Number	Revision Number				
Zion Unit 2	0 5 0 0 0 3 0 4	9 0	- 0 1 2	- 0 1 0	0 2	OF	0 3	

TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

A. CONDITION PRIOR TO EVENT

MODE 3 - Hot Shutdown RX Power 0% RCS [4B] Temperature/ Pressure 547 °F/ 2235 psig

B. DESCRIPTION OF EVENT

On 10/17/90 at approximately 1500, per acceptance criteria of TSSP-96-89, "Fire Damper Drop Test," 2A charging Dump Room fire damper (DTSV-AV-42) was found and declared inoperable. The Fire Marshall and shift engineer were notified of the inoperable damper. Some time later, the test engineer was notified by the Fire Marshall that if the room had fire detection, then an hourly watch would be required. If there was no fire detection in the room then a continuous fire watch would be required. This is in compliance with Technical Specification Section 3.21.6.B. When the actual communication between the Fire Marshall and the test engineer occurred the group had moved on to the 2C Charging Pump Room. When the test engineer was asked whether detection existed in the inoperable damper room (i.e., 2A Chg Pump Room) he walked to where the group was working on the next damper in the 2C Charging Pump Room, looked and saw detection, and reported same to the Fire Marshall. An hourly inspection was incorrectly initiated.

On 10/22/90, at 1845, a review of PT-14 revealed the error, and a continuous fire watch was stationed. A deviation report for this event was written on 10/29/90. It was received by the Operating Engineer on 11/9/90, at which time it was classified as reportable under the requirements of 10CRF50.73(a)(2)(i)(B).

C. APPARENT CAUSE OF EVENT

The root cause of the event is a cognitive personnel error by a contractor/test engineer. The error resulted from a failure to properly utilize the Zion Self Check Program. One of the elements of this program is verification of equipment identity.

D. SAFETY ANALYSIS OF EVENT

The 2A Charging Pump Rm has two inlet dampers (e.g., one is a thermal link fire damper the other is a HVAC pressure control louver) and one outlet damper (e.g., thermal link fire damper). The inlet fire damper was declared inoperable and a one hour inspection of the room was already in place (due to outdated Fire Hazards Analysis Document). If a fire were to have started in the room the outlet fire damper was still functional and would have closed. With the supply fire damper inoperable, supply air would still be sent into the room. A fire coincident with supply air would cause a pressure increase in the room. The HVAC damper would sense the increase in pressure and throttle closed. This would effectively prevent the spread of initial fire to other areas of the plant and the safety margin of the plant would not have been compromised.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			Page (3)		
		Year	Sequential Number	Revision Number			
Zion Unit 2	0 5 0 0 0 13 10 14	9 0	- 0 1 2	- 0 0	0 3	OF	0 3

TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

E. CORRECTIVE ACTIONS

The correct fire watch was stationed on 10/22/90 at 1845. The elements of the CECO Self Check Program will be reiterated at a Tech Staff meeting:

- | | |
|-----------|---------------|
| 1. Stop | 5. Anticipate |
| 2. Locate | 6. Inform |
| 3. Sense | 7. Observe |
| 4. Verify | |

The procedure will be enhanced to include the actions required when a damper fails the drop test.

The contractor/test engineer was counselled by the Technical Superintendent as to the importance of using the Zion Self Check Program, with particular emphasis on verifying proper equipment identity prior to proceeding with any action.

F. PREVIOUS EVENTS

There have been no previous events of this nature.

G. COMPONENT FAILURE DATA

None.