



Commonwealth Edison  
 1400 Opus Place  
 Downers Grove, Illinois 60515

DCD

December 6, 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 Inspection Report  
 Nos. 50-295/90020 and 50-304/90022  
NRC Docket Nos. 50-295 and 50-304

Reference: (a) L.R. Greger letter to Cordell Reed  
 dated November 8, 1990

Dear Mr. Davis:

The letter of reference (a) provided the results of a routine safety inspection of the activities at Zion Station Units 1 and 2 on September 10, 24-28, and October 18, 1990. The letter indicated that certain activities appeared to be in violation of NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in enclosure "A".

We have also included in enclosure "B", a response to concerns regarding off-site dose projections which were included on page 4 of the inspection report.

If you have any questions regarding this response, please direct them to this office.

Respectfully,

T.J. Kovach  
 Nuclear Licensing Manager

Enclosure

cc: NRC Document Control Desk  
 C. Patel-NRR  
 NRC Resident Inspector-Zion

SS:cag  
 ZNLD/664-1

9012180232 901206  
 PDR ADOCK 05000295  
 PDR  
 Q

DEC 12 1990

1703

IE 01  
 11

ENCLOSURE "A"

Commonwealth Edison Company's  
Response to Inspection Report  
Nos. 295/90020 and 304/90022

VIOLATION (295/90020-03)

As a result of the inspection conducted on September 10, 24-28, and October 18, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1990) (Enforcement Policy) the following violation was identified:

50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 500.47 (b) and the requirements of Appendix E to Part 50.

Section 8.5 of the Zion Generating Station Emergency Plan (GSEP) states in part:

"To ensure that the GSEP and the corresponding Emergency Plan Implementing Procedures (EPIP) are kept current; and that updated copies are maintained..."

Step 6 - "...Revised pages of the GSEP shall be dated and marked to show where changes have been made; the new pages added and old pages destroyed;"

Step 7 - "Emergency Plan Implementing Procedures shall be... reviewed every two years."

Step 8 - "Names and phone numbers of the GSEP organization and support personnel shall be reviewed and updated at least quarterly;"

Contrary to the above:

- a. GSEP Zion Annex, Controlled Copy No. 501, contained both Revision 6 and 6a, pages ZA 4-3 and ZA 4-4.
- b. GSEP Zion Annex, Controlled Copy Nos. 541 and 518, did not have Revision 6a dated June 1989.
- c. GSEP Zion Annex, Controlled Copy No. 541, contained a telephone directory which was almost two years old and had not been updated with any of the last nine quarterly updates.
- d. Five EPIP's, (EPIP 099-1, 100-1, 110-1, 410-1, 440-1) were found to contain errors that should have been identified through the two year review process or should have been revised concurrently with other EPIP revisions.

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

ENCLOSURE "A" (cont'd)

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

- a,b,c The identified discrepancies with copies 501, 518, and 541 have been corrected. All other controlled copies of the Generating Station Emergency Plan (GSEP) Zion Annex were reviewed and verified to contain the correct revisions.
- d Zion Station's EPIP's are comprised of 39 individual procedures. The 5 EPIP's identified in the inspection report will be revised by March 1, 1991. This effort is part of a program to review all EPIP's for adequacy.

CORRECTIVE ACTION TO BE TAKEN TO PREVENT FUTURE VIOLATION

- a,b,c Zion Station will perform a review to determine the optimum number of GSEP manuals required at the station and its emergency facilities. Maintenance of an optimum number will facilitate tighter controls. In addition, a biannual review of all controlled GSEP manuals will be performed to ensure current revisions are being maintained.
- d The importance of complete and accurate 2 year reviews has been discussed with the new EP Coordinator.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The review to determine the optimum number of controlled copies of the Zion GSEP will be completed by December 31, 1990.

The first biannual review of controlled copies of the Zion GSEP will be completed by June 30, 1991.

EPIP 099-1, 100-1, 110-1, 410-1, and 440-1 will be revised by March 1, 1991.

Zion Station will be in full compliance by March 1, 1991.

ENCLOSURE "A" (cont'd)

VIOLATION (295/90020-04)

As a result of the inspection conducted on September 10, 24-28, and October 18, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1990) (Enforcement Policy) the following violation was identified:

50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements of Appendix E to Part 50.

Section 8.6 of the Generic Generating Station Emergency Plan (GSEP) states that the operational readiness of emergency equipment and supplies are ensured by quarterly inventory and inspection required by each station's procedures. Zion Emergency Plan Implementing Procedures (EPIP) 420-1, 450-1, 450-2, 550-2 and 550-6 provide required equipment inventories and surveillance frequencies.

Contrary to the above, records documenting completion of required inventories identified in the EPIP's were not available for seven quarterly inventories, ten post drill inventories, and three monthly inventories.

This is a Severity Level IV violation (Supplement VIII)

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

All inventory locations have been reviewed and have been verified accurate. Documentation of this review is on file in the Emergency Preparedness (EP) Coordinator's office. The EP Coordinator has been assigned responsibility for maintenance of this documentation.

To provide additional assurance that all inventories are completed as required, they are now being tracked on Zion Station's computer based surveillance program. This program provides early notification to the person responsible for completion of the surveillance that the activity is coming due.

CORRECTIVE ACTION TO BE TAKEN TO PREVENT FUTURE VIOLATION

Applicable EPIP's will be revised to require that all required inventories are completed. These procedure revisions will be completed by March 1, 1991.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

EPIP revisions regarding required inventories will be completed by March 1, 1991.

Zion Station will be in full compliance by March 1, 1991.

ENCLOSURE "B"

RESPONSE TO INSPECTION REPORT  
CONCERNS REGARDING DOSE PROJECTIONS

CONCERNS:

On page 4 of the inspection report, two areas of concern regarding off-site dose projections are identified as follows:

- A) "A two hour default was utilized for the off-site dose projection performed, and it is not clear that this value is justified. Standard default release times utilized by other Midwest utilities range from four hours to eight hours, with four hours being the most common. It is recommended that the default release time incorporated into the off-site dose projection software be reevaluated."
- B) "The printout from the dose projection software also did not provide information as to the input values. This made assessment of the validity of the completed dose projection difficult. It was not clear whether the input values included an iodine component."

RESPONSE:

- A) Commonwealth Edison determined the two hour value based on a review of NUREG 0654's definition of an Alert criterion for a radiological effluent release. The particular reference is located in Appendix 1, "Emergency Action Level Guidelines for Nuclear power plants", and states:  

"Radiological effluents greater than 10 times technical specification instantaneous limits (an instantaneous rate which, if continued over 2 hours, would result in about 1 mR at the site boundary under average meteorological conditions.)"

Absent formal guidance, Commonwealth Edison believes that the selection of a two hour default release value is appropriate for Protective Action Recommendations. This position has been discussed with Region III personnel in the past.
- B) In the enhanced "C model" dose projection software, all inputs will be shown on the printout. Commonwealth Edison expects to have the C model available in Spring of 1991.