



Commonwealth Edison
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October 29, 1982

Mr. James G. Keppler, Regional Administrator
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Zion Station Units 1 and 2
Response to I.E. Inspection
Report Nos. 50-295/82-19 and
50-304/82-17
NRC Docket Nos. 50-295 and 50-304

Reference (a): September 30, 1982, letter from
R. L. Spessard to Cordell Reed.

Dear Mr. Keppler:

Reference (a) contained the results of an inspection conducted by Messrs. . . R. Waters and G. O. Schneider of your office on July 17 through August 31, 1982, of activities at Zion Station. During that inspection certain activities related to auxiliary feedwater component operability appeared to be in noncompliance with NRC requirements. This matter was the subject of an enforcement conference held September 9, 1982, at the NRC Region III office. The Attachment to this letter provides Commonwealth Edison's response to the Notice of Violation.

To the best of my knowledge and belief, the statements contained in the Attachment are true and correct. In some respects these statements are not based upon my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address questions regarding this matter to this office.

Very truly yours,

L. O. DelGeorge
Director of Nuclear Licensing

FGL/lm

Attachment

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ATTACHMENT

Commonwealth Edison Company

Zion Station Units 1 and 2

Response to Notice of Violation

Item of Noncompliance

The Confirmatory Order of February 29, 1980 Item E.1.C states that the licensee shall "Impose an administrative order requiring expeditious shutdown whenever an independent train of the auxiliary feedwater system and any one of the following are inoperable: All backup sources of off-site power, one of the two diesel generators supplying power to the other independent train or either of the other trains of the auxiliary feedwater system."

The licensee's June 26, 1980, response to the Confirmatory Order indicated that the reactor would be shutdown within 12 hours if 2 out of 3 auxiliary feedwater pumps are inoperable.

Contrary to the above, on August 22 and 23, 1982, an expeditious shutdown was not performed when the 2B diesel generator failed with the 2B auxiliary feedpump out of service. Unit 2 was operated for seventeen hours in this condition.

Corrective Action Taken and Results Achieved

The cause of the violation was misinterpretation by shift personnel of the standing order concerning auxiliary feedwater pump operability requirements. The shift personnel did not realize that Technical Specification 3.7.2, which allows continued operation for up to seven days, no longer applied.

Corrective action has been taken by rewriting the standing order concerning the auxiliary feedwater pump operability requirements. In order to prevent further noncompliance, the Standing Order system has been reviewed. Zion Station has found the system to be adequate, but it is evident that misinterpretations can occur when standing orders and Technical Specifications are in conflict. Zion submitted a request for a Technical Specification change revising the auxiliary feedwater pump operability requirements in December, 1979, and a standing order has been in effect since June, 1980. It has never been intended for standing orders to supercede Technical Specifications for such a long period of time.

Corrective Action To Be Taken To Avoid Further Noncompliance

In order to prevent further misinterpretations, standing orders that conflict with or supercede Technical Specifications will receive an On-Site Review prior to being issued. In this way standing orders can be checked for clarity and accuracy.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved. The standing order has been revised and our Standing Order system has been reviewed. The disparity between the standing order on auxiliary feedwater and the technical specification will be eliminated once the proposed technical specification change change has been issued.

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