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Downers Grove, Illinois 60515

DCID

February 4, 1991

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

Subject: Zion Nuclear Power Station Units 1 and 2
Response to One Level IV Violation and One Deviation
Inspection 50-295/90024; 50-304/90026
NRC Docket Nos. 50-295 and 50-304

Reference: W.L. Forney letter to Cordell Reed dated
January 4, 1991 transmitting NRC Inspection
Report 50-295/90024; 50-304/90026

Mr. Davis:

Enclosed is Commonwealth Edison Company's (CECO) response to the subject Inspection Report. A Notice of Deviation (NOD) was transmitted with the subject Inspection Report. The NOD identified activities which appear to be deviations from previous correspondence with the Commission regarding the use of overtime. Also included was a Level IV Violation for which no Notice of Violation (NOV) was issued because a Violation regarding the same matter had been issued in a previous inspection. This Violation identified an example of an unposted and unbarricaded contaminated area and three areas which were appropriately barricaded but not posted as being contaminated. All four areas were located within the auxiliary building. This Violation requested CECO to revise the response to the NOV issued with Inspection Report 50-295/90022-06 and 50-304/90024-06.

CECO understands the significance of the events, the need for effective corrective actions to prevent recurrence and has considered these in developing actions in response to the cited violation and deviation.

If your staff has any questions or comments concerning this letter, please refer them to Annette Denenberg, Compliance Engineer at (708) 515-7352.

Very Truly Yours,

For Tom J. Kovach
Nuclear Licensing Manager

Enclosure

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

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ENCLOSURE

COMMONWEALTH EDISON COMPANY
RESPONSE TO NRC INSPECTION REPORT
NOS. 50-295/90024 and 50-304/90026

Violation 50-295/90022-06; 50-304/90024-06
Contaminated Area Posting and Barricading

Technical Specification 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).

Supplemental Response To Violation
50-295/90022-06; 50-304/90024-06

Zion Administrative Procedure ZAP-05, "Station Material Condition Program" will be revised to direct the Material Condition Zone Inspectors to contact the Radiation Protection Department immediately when any potentially contaminated leaks are identified or when contamination may have spread from its original boundary. This procedure revision will be completed by February 28, 1991. Additionally, a news letter will be distributed by February 15, 1991 to reinforce the fact that it is every employee's responsibility to report leaks or areas that do not appear to be properly controlled.

A tailgate session was held with Radiation Protection Technicians on November 30, 1990 to reinforce the importance of smear surveying along contamination boundaries during routine floor surveys to ensure that contamination is not being spread from controlled areas. Also, a large area smear program was implemented in December of 1990. Large area smears used in uncontaminated areas of the Auxilliary Building cover a much larger area and will detect the low level spread of contamination much sooner than the previous method used. Zion believes that these additional actions will ensure identification and control of contaminated areas.

Notice Of Deviation 295/90024-01; 304/90026-01
Use of Overtime

During a NRC inspection conducted on October 15 through December 8, 1990 a deviation of your Zion station management commitment to the NRC regarding your overtime policy as stated in your response to the Diagnostic Evaluation Team (DET) Report dated November 2, 1990, was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action", 10 CFR Part 2, Appendix C, (1990), the deviation is listed below:

On July 31, 1990, at a meeting, Zion station management committed to the NRC Region III Deputy Director, Division of Reactor Projects that all overtime which would result in exceeding the NRC/Corporate guidelines as stated in ZAP-09, "Overtime Guidelines," requires preapproval from the Operating Engineers, the Assistant Superintendent of Operations, or the Production Superintendent.

A September 4, 1990, memo from the Assistant Superintendent of Operations to the Operating shift personnel stated that, should a situation arise where a violation of NRC/Corporate guidelines would occur, prior approval will be obtained by station management.

During the September 17, 1990, monthly Performance Improvement Plan update meeting in Region III with A. Bert Davis, Regional Administrator, the licensee reiterated that preapproval by station management for those instances where deviation from the guidelines was required.

The response to the DET Report dated November 2, 1990 reaffirmed that Zion Station would adhere to the Nuclear Operations' Directive regarding overtime through additional staffing, improved work planning, and strict adherence with strengthened overtime guidelines.

"Overtime Guidelines," ZAP 09, states in part, "An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period (all excluding shift turnover)."

Contrary to the above, during the week of November 5, preapproval by station management was not obtained prior to two individuals working greater than 24 hours within a 48 hour period. The individuals had worked 28 and 27 hours respectively.

On November 12, 1990, appropriate controls were not implemented which resulted in an individual working 78 hours within a 7 day period.

Reason For The Deviation

The causes of the NRC identified events were weaknesses in the methods used to schedule personnel.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Since November 12, 1990, management attention to policy and procedures associated with this issue has been a high priority. Subsequent to the notice of deviation, another overtime deviation occurred on January 25, 1991 without station management preapproval. The cause of this event was a person not reporting to work as scheduled thereby causing another individual to be held over in excess of guidelines. This deviation could not have been anticipated. The Operations Department is continuing to review manpower scheduling methods to limit the potential for deviating from guidelines.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER DEVIATION

As requested in the inspection report, Zion Station is asked to address three underlying factors contributing to excessive overtime.

- a. Outage scheduling was unrealistic with respect to maintaining reasonable compliance with the NRC Policy and administrative procedures for the control of overtime.

Response:

- 1) Since the time of the inspection, the Operating Department/Planning Department interface has been modified. A full time person has been assigned lead responsibility with respect to interacting with the Planning Department and other departments. Previously, this position was handled on a part time basis. In addition, the method of scheduling activities such as Periodic Tests (PT's) has been improved such that manpower requirements can be anticipated. These actions should assist the Operating Department in planning manpower allocations and avoiding overtime guideline deviations, while supporting scheduled activities.
- 2) Outage schedule development improvement efforts are underway. In the Outage Planning Area, the Work Planning Department has increased manpower and attention to Outage Scheduling. Currently, one qualified individual per unit has responsibility for outage schedule development. Efforts to plan the next two refueling outages are underway. In addition, an outage planning procedure is being developed to more clearly identify outage planning requirements. This procedure will be implemented by March 30, 1991.
- 3) Outage schedule development includes the need to work overtime. All departments governed by the overtime guidelines are responsible to schedule their personnel to accomplish scheduled activities without deviating from established guidelines. If a scheduled activity cannot be accomplished without deviating from overtime guidelines then the activity will be rescheduled.

- b. Staffing at minimum levels resulted from inadequate forecasting and support of personnel needs.

Response:

- 1) Zion Station acknowledges that current staffing levels are below optimum or desirable numbers and has established plans to significantly increase permanent staff levels. Current plans call for an increase in Operations bargaining group staff of approximately 46% over the coming year. As of January 1, 1992, a target value of 85 bargaining unit individuals should be qualified and available for shift duties compared to 58 individuals as of January 1, 1991. Increased staffing is also planned in the Operating Department management group. These increased staff levels will reduce the excessive overtime levels that have occurred in the past.

- c. Collective Bargaining agreements that allowed individuals to volunteer for excessive amounts of overtime and required the licensee to make overtime available to union members in excess of the overtime worked by contract personnel performing similar duties.

Response:

- 1) Current policy dictates that individuals may not volunteer for overtime if guidelines will be violated. Individuals with the least amount of cumulative overtime are first offered available positions unless, by working that overtime, NRC guidelines would be violated. In this case, the individual would be bypassed and the overtime offered to the next individual.

DATE WHEN CORRECTIVE ACTION WILL BE COMPLETED

The outage planning procedure will be completed by March 30, 1991. The manpower scheduling process review will be completed by March 30, 1991.

The Operations bargaining group staff increase is anticipated to be completed by January 1992.