



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

DCD

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 Two Level IV Violations
 Inspection 50-295/90031/ 50-304/90031
 NRC Docket Nos. 50-295 and 50-304

Reference: W.L. Forney letter to Cordell Reed dated
 January 4, 1991 transmitting NRC Inspection
 Report 50-295/90031; 50-304/90031

Mr. Davis:

Enclosed is Commonwealth Edison Company's (CECo) response to the subject Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited two level IV violations. The violations concerned three examples of failure to follow procedures, and failure to maintain sufficient records.

The enclosed response to violation 50-295,304/90031-01 has addressed the corrective actions taken and the results achieved; corrective actions to be taken to avoid further violations; and the date when full compliance will be achieved for parts "a" and "c" of the violation. CECo disagrees that part "b" of this violation constitutes a violation; the reasons for this decision are detailed in the subject response.

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 violations.

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. 50-295/90031 and 50-304/90031

Violation 295/90031-01 and 304/90031-01
Failure to follow Procedures

1. 10 CFR 50, Appendix B, Criterion V states: "Activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures."
- a. Zion Administrative Procedure, 10-52-2, Section C.1.n, Rev. 3, states that Nuclear Station Operators "Record the shift activities and significant events" including: "Periodic tests or tests following maintenance whether completed satisfactory, failed or incomplete."

Contrary to the above, numerous surveillance tests were not appropriately logged in the Nuclear Station Operators' unit logs.

- b. Zion Administrative Procedure 3-51-4, Rev. 13, Temporary Alteration Program, Section B, Scope, states: "Temporary Alterations are changes made to plant equipment intended to be temporary, that do not conform with approved drawings or other design documents. This procedure shall be used to make temporary alterations to all safety related and non-safety related instrumentation, control circuits, alarm circuits, components, and systems."

Contrary to the above, the licensee attached a hose to the fire protection system header located by the traveling screens in the crib house. This hose was attached directly to the header and the isolation valve was open. This condition has existed for several years and the licensee had never considered this to be a temporary alteration.

- c. Zion Administrative Procedure 5-51-4, Rev. 15, Procedure Control and Approval, Section E.2.3, Controlled Procedures, states: "The holder of a controlled procedure shall keep a copy up to date."

Contrary to the above, the Operations department had left an out of date procedure SOI-11, "Diesel Generators", Rev. 14, hanging in a plastic cover on the control panel for the 1A emergency diesel generator for ten months following a subsequent revision.

This is a Severity Level IV violation (Supplement 1).
(50-295/90031-01(DRP); 50-304/90031-01(DRP))

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

- a. Zion management has been monitoring operating logs and has noted improvements in logkeeping practices since the latter part of 1990. Zion management also recognizes that improvements in logs and logkeeping practices are still needed.

Beginning in 1990 logkeeping requirements were added to the licensed operator continuing training program. Additional seminars, recently completed during the current training cycle, emphasized the quality, accuracy, and completeness of logs. Zion believes that continuing training along with management oversight will result in logs which meet our expectations.

- b. Disagreement of Part "B" of the Violation

Zion Administrative Procedure ZAP 3-51-4 states that "Temporary Alterations (TA) are changes made to plant equipment intended to be temporary, that do not conform with approved drawings or other design documents. This procedure shall be used to make temporary alterations to all safety related and non-safety related instrumentation, control circuits, alarm circuits, components and systems".

Piping and Instrument Drawing P&ID M43 and M513 show fire station header including standpipes, service connections and valves for one inch hose applications. These standpipes are designed with "house" service connections throughout the plant and are designated on the P & ID as service water connections. Zion was not designed with a "house" (non-safety related) water system. Zion Station believes that because the system design shows this typical application, no violation of the procedure exists.

- c. The outdated procedure was removed. All five diesel generator rooms were inspected to ensure that no out of date procedures were present.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

- a. Operating management will continue to review shift logs for strengths and weaknesses and to ensure logs are being maintained in accordance with existing procedures. Strengths, weaknesses and deficiencies noted by Operating management will be presented on an on-going basis to the affected crew or individual during shift turnover activities or via written memoranda.

To review potential enhancements to current requirements and practices, a committee is being formed to review current logkeeping standards relative to industry practices. This committee will review and evaluate the deficiencies noted in the inspection report. This review will be completed by June 1, 1991.

- b. None.
- c. The Operating Department will review existing procedural guidance relative to this violation. This review will be completed by June 1, 1991. Based on the results of this review, enhancements, if required will be made to existing programs. In addition, a memoranda stressing personnel awareness of this violation will be written by February 28, 1991.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The review for potential enhancements regarding log keeping practices will be completed by June 1, 1991.

The procedural guidance review regarding procedures left in the field will be completed by June 1, 1991.

Memoranda regarding awareness of utilizing only currently approved procedures in the field will be issued by February 28, 1991.

Violation 295/90031-02 and 304/90031-02
Failure to maintain sufficient records

10 CFR 50, Appendix B, Criterion XVII states: "Sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include the monitoring of work performance".

Contrary to the above, the licensee lost several hundred work requests that were written between 1980 and 1990. As a result of this, the licensee has been unable to document whether or not the work described in the missing work requests was actually performed.

This is a Severity Level IV violation (Supplement 1).
(50-295/90031-02(DRP); 50-304/90031-02(DRP))

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Zion Station has identified three causal factors which contributed to the work requests being misplaced or lost:

1. Total Job Management (TJM) involvement in the process.

Initially, the TJM Coordinator was not involved with the in-line processing/flow of the work request. This has been changed and proceduralized in Zion Administrative Procedures which govern the work control system and TJM Department involvement.

2. TJM resources:

The TJM department has lacked the resources necessary to fully maintain an accurate database. To address this concern, in early 1990, the TJM department obtained the services of a consultant to help locate all pending work requests. Since the scope of the TJM responsibilities has continued to increase over the past year, Zion is reviewing resource requirements to assure the TJM department can adequately support work control activities. This resource assessment will be completed by April 30, 1991.

3. Work Request Tracking System (WRTS)

Zion did not have a work request tracking system for most of the period in question (1980-1990). Also, when WRTS was first put in place at Zion it was not fully implemented. However, Work Control System Procedures now govern WRTS activities. Zion Station senior management has issued memoranda to all department heads defining expectations with regards to the WRTS. This will assure accurate tracking and control of work requests.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

The Technical Staff participation in the location and disposition of missing work requests was under direction of the TJM coordinator. The list of "missing" work requests associated with active modifications was not properly reviewed. To correct this deficiency, the Technical Staff Modification Coordinator will review this list to identify which work requests should be cancelled and which should remain active. This review will be completed by February 28, 1991. Although work requests associated with active modifications were cancelled, those modifications cannot be performed except with an active work request.

Where system walkdowns have shown that work was performed for a given "missing" safety related work request, Zion is continuing a search of records in an effort to document work performed. This review will be completed by February 28, 1991.

The Zion Nuclear Quality Programs (NQP) department will review the station's progress towards minimizing lost work requests during the next scheduled corrective action audit. This audit is currently scheduled for July 1991. Additionally, NQP plans to perform quarterly reviews of the Zion WRTS via Field Monitoring Reports. Both methods will assess effectiveness of the station's corrective actions implemented to resolve the issue of lost work requests.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The TJM Departmental resource review will be completed by April 30, 1991.

The Technical Staff review of "cancelled" work requests versus "active" modifications will be completed by February 28, 1991.

The review to attempt to document work activities for "missing" safety related work requests will be completed by February 28, 1991.

The NQP audit of WRTS activities will be completed in July 1991.