



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

September 10, 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. 50-295/82-14
and 50-304/82-13
NRC Docket Nos. 50-295 and 50-304

- References (a): August 13, 1982, letter from
R. L. Spessard to Cordell Reed.
- (b): July 23, 1982, letter from
F. G. Lentine to J. G. Keppler.

Dear Mr. Keppler:

Reference (a) contained the results of an inspection conducted by Messrs. Waters, Connaughton, Heller and Peschel of your office on May 15 through July 16, 1982, of activities at Zion Station. During that inspection, the startup of Unit 2 with "0" diesel generator out of service on June 28, 1982, was identified as an item of noncompliance. A meeting was held at the NRC Region III office on July 21, 1982, to discuss this event. At that meeting, Commonwealth Edison stated the belief that this item did not constitute a violation of the Zion Technical Specifications or other NRC requirements.

This letter provides a summary of Commonwealth Edison's position and outlines our proposed action.

EVENT DESCRIPTION

On June 25, 1982, Unit 2 tripped from full power at 2:30 p.m. The initiating event was a ground on the main transformer. It was later determined that fire fighting exercises conducted to the north of the turbine building had resulted in the transformers being covered with a residue of the fire fighting chemical. A sudden rain had interacted with the chemical forming a conducting solution and the transformer busses arced to ground. The ground tripped the main generator which tripped the turbine, which in turn tripped the reactor. Since arcing had also been reported on the system auxiliary transformer, a plant cooldown was commenced at 7:22 p.m., June 25, 1982, to allow the system auxiliary transformer to be externally cleaned and inspected. The reactor coolant system was brought below 200°F on June 26, 1982, at 9:40 a.m. The loads

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were switched to the diesel generators and the system auxiliary transformer was de-energized at 3:40 p.m., June 26, 1982. Following completion of the cleaning and inspection of the transformer, offsite power was restored at 7:00 p.m. June 26, 1982.

As a result of high temperature alarms, the "0" diesel generator was taken out of service for repair at 12:30 a.m., June 27, 1982. At 4:00 a.m., June 27, 1982, a reactor coolant pump heatup was commenced in preparation for taking Unit 2 critical. The unit exceeded 200°F at approximately 9:00 a.m. on June 27, 1982. Unit 2 was made critical at 9:16 p.m., June 28, 1982, and tied to the grid at 6:02 a.m., June 29, 1982. The post repair testing of the diesel generator was completed at 1:00 a.m., June 29, 1982.

The Unit 2 trip on June 25, 1982 was classified by Zion Station as an "inadvertent trip" per Section 1.0.D of the Technical Specifications. This allowed the startup of June 28, 1982 to proceed under Section 3.15.2.C of the Technical Specifications which allows recovery from an inadvertent trip with one diesel generator out of service. The NRC disagrees with the classification of the June 25 trip as inadvertent. Under the NRC's interpretation, the subsequent startup should have proceeded under Section 3.15.1.B of the Technical Specifications which requires all diesel generators to be operable.

COMMONWEALTH EDISON POSITION

Commonwealth Edison believes that the Unit 2 trip on June 25, 1982 was properly classified as inadvertent. The grounding of the main transformer was unrelated to any reactor primary plant transient. As such, this event did not alter any of the probabilities of an accident occurring or of additional equipment failures. (Commonwealth Edison's current interpretation of Section 1.0.D of the Technical Specifications is discussed in detail in the Attachment to this letter.) Thus, the June 25, 1982 Unit 2 trip should not alter any of the allowed time periods for unit operation with inoperable equipment.

This interpretation has been utilized on many occasions in the past. Some of these events were discussed at the July 21 meeting. None of these events resulted in any enforcement action.

In addition, Commonwealth Edison believes that it is inappropriate to arbitrarily limit recovery actions with respect to time or plant mode. In the case of the June 25 trip, the recovery process included cleaning of the system auxiliary transformer as an appropriate action to prevent a recurrence of the trip. Since this action was best performed with the transformer de-energized, a mode change (plant cooldown) was undertaken.

COMMONWEALTH EDISON COMMITMENTS

Commonwealth Edison will follow the policy outlined in reference (b) until Zion Station and the NRC reach an agreement on the use of Section 1.0.D of the Technical Specifications. Our current interpretation of the intent of Section 1.0.D is attached. We will discuss this interpretation with the NRC's Zion Resident Inspection, and we remain available for further discussions with additional NRC personnel as required in order to reach an acceptable resolution.

Please address questions regarding this matter to this matter to this office.

Very truly yours,

W. L. Stiede

W. L. Stiede
Assistant Vice President

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Attachment

cc: Zion Resident Inspector

SUBSCRIBED and SWORN to
before me this 10th day
of September, 1982

Rosalie A. Pinta
Notary Public

ATTACHMENT

CURRENT ZION STATION INTERPRETATION OF TECH SPEC SECTION 1.0.D

Inoperable equipment limitations and the associated time limit for an inoperable piece of equipment as stated in the Tech Specs are based on several factors:

1. The need for the inoperable piece of equipment to mitigate the consequences of an accident.
2. A reasonable repair time for equipment failures.
3. The probability of additional equipment failures.
4. The probability for an accident to occur that would require the equipment to be available.

For startup after a trip to affect the inoperable equipment allowance or the duration of inoperability stated in the Tech Specs, the cause of the trip or the act of starting up would have had to affect one of the above items upon which the Tech Specs were based.

The trips which could not be considered as inadvertent, therefore, are those that result from reactor plant transients that could alter the probability for additional equipment failure due to the challenge that was put on the equipment or could alter the probability for an accident to occur due to physical parameter changes such as temperature, pressure, or power excursions.

Our position is that balance of plant initiated trips caused by personnel error or minor equipment malfunctions do not alter the probabilities upon which the Tech Specs were based and therefore can be considered as inadvertent trips and the existing Limiting Conditions for Operation for inoperable equipment apply.

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Commonwealth Edison
 One First National Plaza, Chicago, Illinois
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July 23, 1982

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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
Recovery from Inadvertant Trip
NRC Docket Nos. 50-295 and 50-304

Dear Mr. Keppler:

This is to inform you of the actions we will be taking regarding startup of the Zion units with equipment required by the Technical Specifications out-of-service, and the interpretation of the phrase "recovery from inadvertant trip." These matters were discussed with members of your staff in an Enforcement Conference at Region III on July 21, 1982.

Pending the development of a written interpretation of the existing Technical Specification that is mutually acceptable to Commonwealth Edison and the NRC (or a modification of the existing Technical Specifications), the following actions will be taken upon a trip of one of the Zion units:

1. The cause of the trip will be determined and corrected, and the unit will be prepared for startup according to General Operating Procedure-1. This procedure includes checklists that verify the availability of Technical Specification required equipment. (Note: This is a reaffirmation of the policy currently in effect.)
2. If equipment required by the Technical Specifications is inoperable, the following actions will be taken:
 - a) A determination will be made as to whether the planned startup constitutes "recovery from inadvertant trip." This determination will be made by applying a conservative interpretation of the definition of "inadvertant", with consideration of the current NRC regulatory position as presented at the July 21 meeting. This determination will require the concurrence and approval of the Zion Station Superintendent and the Vice President and General Manager of Nuclear Stations or his designated alternate.
 - b) The NRC will be informed of the results of our determination. However, the act of informing the NRC will not be considered a prerequisite for unit startup.

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J. G. Keppler

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July 23, 1982

Commonwealth Edison will begin the development of a written clarification to the Technical Specifications, and will enlist the co-operation of the NRC's Zion Resident Inspector and other members of the NRC staff in this effort.

Please address any questions that you may have concerning this matter to this office.

Very truly yours,

F. G. Lentine

F. G. Lentine
Nuclear Licensing Administrator

lm

cc: Zion Resident Inspector

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