

NOTICE OF DEVIATION

Commonwealth Edison Company
Zion Nuclear Power Station

Docket Nos. 50-295;50-304
License Nos. DPR-39; DPR-48

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:

- A. 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 pre-approval 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 pre-approval 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-hours 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, pre-approval 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.

Please provide to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region III, and if applicable, a copy to the NRC Resident Inspector, in writing within 30 days of the date of this Notice, the reasons for the deviation, the corrective steps which have been taken and the results achieved, the corrective steps which will be taken to avoid further

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deviations, and the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

Dated at Glen Ellyn, Illinois
this 4th day of January, 1991.