



Commonwealth Edison
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February 16, 1983

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. 50-295/82-20 and 50-304/82-18
NRC Docket Nos. 50-295 and 50-304

- References (a): December 3, 1982, letter from
C. E. Norelius to Cordell Reed.
- (b): December 29, 1982, letter from
L. G. DelGeorge to J. G. Keppler.
- (c): January 14, 1983, letter from
C. E. Norelius to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection conducted by Messrs. R. Farrell, R. Hasse, and J. Peschel of your office on October 25-29, 1983, of activities at Zion Station. During that inspection, certain activities appeared to be in noncompliance with NRC requirements. One of the items was characterized as the failure to file a Licensee Event Report for a missed surveillance item. Reference (b) provided Commonwealth Edison's response, which included the basis for our determination that the missed surveillance item was not reportable. In reference (c), the NRC concurred with our reportability determination, but requested that we address the failure to perform the required surveillance. This is to provide Commonwealth Edison's response to that request.

This missed surveillance consisted of the omission of approximately four (4) weekly pilot cell voltage readings for each of the station batteries during the period March-April, 1982. As described in our response of reference (b), due to the fact that an extensive surveillance program is performed on the station batteries, other data taken during this period were sufficient to confirm the operational capability of the batteries. Therefore, the omission of the weekly pilot cell voltage readings had no adverse safety implications.

As described in the NRC's report of reference (a), the missed surveillance resulted from a change to the PT-0 procedure that inadvertently deleted the required item. The omission was discovered by the Operating Engineer in the course of his review of the PT-0 checksheets, which is required by the PT-0 procedure. The PT-0 procedure was immediately changed to reinstate the surveillance item. Thus, the event demonstrates that our procedural requirements for management review were effective in promptly identifying and correcting the error.

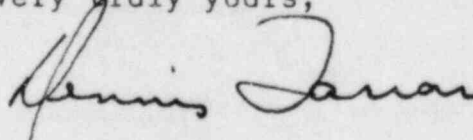
Changes to operating surveillance procedures are performed in accordance with Zion Administrative Procedure (ZAP) 5-51-4. As described in ZAP 5-51-4, the requestor performs and documents a review of the change in accordance with the requirements of 10 CFR 50.59, which includes consideration of relevant technical specifications. The proposed change and the 50.59 review must then be approved by the Station Review process. ZAP 5-51-4 specifies that Station Review shall consist of at least two members, at least one of which shall hold a valid Senior Reactor Operator's (SRO) license. For operating surveillance procedures, the Operating Engineer and the Technical Staff Supervisor or their designated alternates must participate in the review. In addition, concurrence and authorization are required by the Station Superintendent.

For the event in question, the provisions of ZAP 5-51-4 with respect to the content of and participation in the review process were followed as prescribed. The error is considered an isolated case of oversight by the individuals involved. This is evidenced by the fact that nearly 400 changes are processed per year for operating procedures alone, and that such errors have not been a recurring problem.

In summary, Commonwealth Edison believes that the existing procedural controls governing operating surveillance and procedure changes, by specifying a high level of management involvement and requiring appropriate technical expertise by review participants, provide a high degree of assurance that procedure changes will not inadvertently delete technical specification surveillance items.

Please address questions regarding this matter to this office.

Very truly yours,



D. L. Farrar
Director of Nuclear Licensing

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