



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

December 31, 1992

U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Zion Nuclear Power Station Unit 1 and 2
Response to Inspection Report 50-295(304)/92023
NRC Docket Number 50-295 and 50-304

Reference: H. J. Miller letter to Cordell Reed dated
December 4, 1992, transmitting Inspection Report
50-295(304)/92023.

Enclosed is the Commonwealth Edison Company (CECo) response to the subject violations which were transmitted with the referenced letter and Inspection Report. One violation concerns the adequacy of a safety evaluation. The other violation concerns the performance of post-maintenance testing.

If there are any questions or comments regarding this response, please contact Sara Reece-Koenig, Compliance Engineer, at 708/515-7250.

Sincerely,

T.J. Kovach
Nuclear Licensing Manager

Attachments

cc: A. Bert Davis, Regional Administrator - Region III
C. Shiraki, Project Manager, NRR
J. D. Smith, Senior Resident Inspector, Zion

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**RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS.
50-295/92023; 50-304/92023**

VIOLATION (295(304)/92023-01)

10 CFR 50.59 (b)(1) requires that records of changes made in the facility as described in the safety analysis report must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, the 10 CFR 50.59 safety evaluation for temporary alteration 90-053, "Bit Outlet Valve Leakage Reroute to RCDT", dated June 9, 1990, was not adequate to provide a basis for the determination that this temporary alteration did not involve an unreviewed safety question.

This is a Severity Level IV violation (Supplement I).

REASON FOR THE VIOLATION

Commonwealth Edison Company (CECo) acknowledges the violation. The safety evaluation performed for Temporary Alteration 90-053 "Bit Outlet Valve Leakage Reroute to RCDT" dated June 9, 1990 did not explicitly state that failure of the relief valve on the leak off line had been considered in review of possible failure modes for the Temporary Alteration. This safety evaluation was completed on May 14, 1990, prior to revision of the safety evaluation training program at Zion in 1991.

Although CECo acknowledges the violation, CECo does not believe that this particular safety evaluation is representative of the quality of safety evaluations currently performed at Zion Station. During the August, 1991 Routine NRC Inspection of Design Changes and Modifications (Inspection Reports Nos. 50-295/91014; 50-304/91014), the inspectors singled out the safety evaluations performed for Temporary Alterations for their improved quality. Several 1991 safety evaluations were described in this report as "excellent in terms of depth of safety issues evaluated".

During the inspection which discovered this violation, the inspection team indicated that while they were not fully familiar with the findings of the 1991 NRC inspection, it was their opinion that the quality of 1991 and 1992 safety evaluations at Zion has been inconsistent. Since Zion has made significant efforts to improve in this area and previous feedback from NRC Inspectors has been positive, this statement is of concern to CECo. During the inspection exit, Zion management personnel questioned this observation. The inspectors indicated that no one particular safety evaluation stood out, but that in a number of evaluations, the detail provided for explaining the evaluating engineer's thought process could have been greater.

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NRC INSPECTION REPORT NOS.
50-295/92023; 50-304/92023

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

An engineering evaluation was performed on October 21, 1992 during the inspection. Based on this evaluation it was determined that an unreviewed safety question for Temporary Alteration 90-053 did not exist. As indicated in the inspection report, this information was shared with the inspectors at that time.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

The Zion Station Technical Staff will review all safety evaluations for active temporary alterations installed prior to July 1, 1991. This review will be completed by May 31, 1993.

Although CECO considers the current quality of Safety Evaluations performed at Zion Station to be adequate, the Zion Station Quality Verification department has scheduled an audit which will include a review of recent safety evaluations. This review will focus on the quality, consistency, and thoroughness of documentation in safety evaluations performed at Zion since July 1, 1991. This audit is scheduled to be performed during the first half of 1993.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on October 21, 1992 upon completion of the engineering evaluation.

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS.
50-295/92023; 50-304/92023

VIOLATION (295/92023-03)

10 CFR 50, Appendix B, Criterion XI, Test Control, states in part, that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures.

Contrary to the above, on March 22, 1991, adequate testing required to demonstrate that components perform satisfactorily was not performed following maintenance on valve 1MOV-RH8701. The maintenance work disabled a valve interlock which was not verified by post-maintenance testing.

This is a Severity Level IV violation (Supplement I).

REASON FOR THE VIOLATION

Commonwealth Edison Company (CECo) acknowledges the violation. Post Maintenance Testing (PMT) following maintenance on valve 1MOV-RH8701 on March 22, 1991 was performed. However, this testing was not adequate to fully test the interlock function associated with the valve. The test specified by the Licensed Shift Supervisor (LSS) was Technical Staff Surveillance (TSS)-15.6.115 "MOV-RH8701 & 8702 Backleakage Test". In addition to this test, the LSS should have specified that Periodic Test (PT)-2C-D-ST "ECCS Valve Stroke and Interlock Test and ECCS Continuity Test During Heatup" be performed.

The root cause analysis performed for Zion Station Deviation Report (DVR) 22-1-91-142 determined the root cause of the interlock failure to be inadequate maintenance. The subject inspection report found that the DVR did not identify as a contributor the inadequacy of Post Maintenance Testing following maintenance on 1MOV-RH8701. CECO concurs that this contributor should have been identified in the DVR.

The subject inspection report also indicated that an additional factor contributing to the significance of the violation is that in July 1992, limit switch maintenance was once again performed on a MOV-RH8701 valve without the requirement for the interlock test. While the work request in question did not specify that PT-2C-D-ST was required, it did specify performance of "PT-2C". The PT-2C series of procedures includes in it PT-2C-D-ST. The limit switch maintenance in question was performed on July 25, 1992 and performance of PT-2C-D-ST was completed on July 26, 1992 prior to closing out the work package.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

On December 29, 1991 the limit switches and rotor position for 1MOV-RH8701 were adjusted and PT-2C-D-ST was performed satisfactorily.

On June 15, 1992 the Zion Operability Determination Manual (ZODM) for the Residual Heat Removal System was approved. This manual is designed to assist Operating personnel in determining the operability status of the system. Included in this document are a listing of the applicable tests for determining operability.

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CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

A letter from the Assistant Superintendent for Operations (ASO) to all Licensed Shift Supervisors reviewing this violation and corrective actions was issued on December 31, 1992. This letter stressed the importance of conducting proper post maintenance testing to ensure operability of affected systems and sources of guidance available regarding PMT requirements.

The Regulatory Assurance Supervisor will review this event with the Station's Root Cause Committee. The need to ensure that all contributing causes are identified before an investigation is accepted as complete will be stressed. This review will be completed by January 31, 1993.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on December 29, 1991 with the satisfactory completion of PT-2C-D-ST.