

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-295

Docket No. 50-304

As a result of the inspection conducted during the period of November 16, 1987, through March 14, 1988, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1987), the following violations were identified:

1. 10 CFR 50.48 requires that each operating Nuclear Power Plant have a fire protection plan that satisfies Criterion 3 of Appendix A to 10 CFR 50. Criterion 3 requires that structures, systems and components important to safety be protected against the effects of fires and explosions. To satisfy the requirements of Criterion 3, the Licensee was required to meet the technical requirements of Appendix R to 10 CFR 50. Section III.L of Appendix R to 10 CFR 50 requires procedures to be in effect to implement the alternative shutdown capability. The licensee was also required to meet the technical requirements of Appendix R to 10 CFR 50 in accordance with the 10 CFR 50.48(c) schedule. The date required by this schedule was July 7, 1983.

In addition, Plant Operating Technical Specification No. 6.2.1.K requires written procedures and implementation of these procedures for the Fire Protection Program.

Contrary to the above, safe shutdown procedures required by Section III.L of Appendix R to 10 CFR 50 and plant operating Technical Specification No. 6.2.1.K were not implemented as follows:

- a. As of November 18, 1987, no approved operating procedures were implemented to achieve hot shutdown following a fire in the Inner Cable Spreading Room and the Outer Cable Spreading Room.
- b. As of November 18, 1987, no approved procedures were established to mitigate spurious operation of equipment or high impedance faults in areas not required for remote shutdown.

This is a Severity Level IV violation (Supplement 1).

2. Technical Specification No. 4.21 requires that each of the safety-related penetration fire barriers be verified to be functional by a visual inspection at least once per 18 months. The licensee was required by 10 CFR 50.48(c) to update procedures to encompass safety-related fire barriers by July 7, 1983.

Contrary to the above as of November 18, 1987, the inspector identified that the safety-related fire wall which separates the Auxiliary Building from the Turbine Building was not included in the surveillance requirements of Technical Specification No. 4.21. In addition, no other documented surveillance was performed on this safety-related fire barrier.

This is a Severity Level IV violation (Supplement 1).

3. 10 CFR 50.48 requires that each operating nuclear power plant have a fire protection plan that satisfies Criterion 3 of Appendix A to 10 CFR 50. Criterion 3 requires that structures, systems and components important to safety be protected against the effects of fires and explosions. To satisfy the requirements of Criterion 3, the licensee was required to meet the technical requirements of Appendix R to 10 CFR 50. Section III.J of 10 CFR Part 50, Appendix R, requires emergency lighting units with at least an 8 hour battery power supply to be installed in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto. The licensee was required by the 10 CFR 50.48(c) schedule to install the emergency lights by March 7, 1984.

Contrary to the above, the inspector identified on November 19, 1987, that emergency lighting was not installed or was inadequate in the following areas:

- ° 617' Auxiliary Building, General Area (inadequate lighting installed)
- ° MCC 2391 Switch Gear Room (inadequate lighting installed)
- ° MCC 2381 B Switch Gear Room (inadequate lighting installed)
- ° Mainstream Valve House (inadequate lighting installed)
- ° Upper Valve House (no lighting installed)

This is Severity Level IV violation (Supplement 1).

4. Amendment No. 36 to Facility Operating License No. DPR-39 and Amendment No. 33 to Facility Operating License No. DPR-48 requires the licensee to complete the modifications identified in Paragraphs 3.1.1 through 3.1.20 of the NRC's Fire Protection Safety Evaluation dated February 1978 by the end of the third refueling outage for Zion Unit 2 and prior to return to operation for Cycle 4 (April 18, 1979). Paragraph 3.1.5 states that an approved controller which conforms to the requirements of NFPA 20 will be provided for the electric motor driven fire pump.

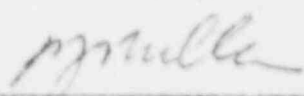
Contrary to the above, on December 4, 1987, an approved controller which conforms to the requirements of NFPA 20 was not provided for the electric motor driven fire pump.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

APR 8 1988

Date


Hubert J. Miller, Director
Division of Reactor Safety