



**Commonwealth Edison**

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May 31, 1988

Mr. A. Bert Davis  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL. 60137

Subject: Zion Nuclear Power Station Units 1 and 2  
Response to NRC Inspection Report Nos.  
50-295/88-009 and 50-304/88-010  
NRC Docket Nos. 50-295 and 50-304

Reference: April 29, 1988 letter from W.L. Forney to Cordell Reed

Dear Mr. Davis:

This letter is in response to the inspection conducted by M.M. Holzmer and P.L. Eng of your office from February 25 through April 13, 1988 of activities at the Zion Nuclear Power Station. The referenced letter indicated that certain activities appeared to be in noncompliance with NRC requirements. Commonwealth Edison Company's response to this violation is provided in the Attachment to this letter.

Please direct any questions that you may have to this office.

Very truly yours,

H. E. Bliss  
Nuclear Licensing Manager

/klj

cc: NRC Resident Inspector-Zion

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## ATTACHMENT

### ZION NUCLEAR POWER STATION RESPONSE TO NOTICE OF VIOLATION

#### VIOLATION

10 CFR 50, Appendix B, Criterion III, as implemented in the licensee's approved Quality Assurance Topical Report, CE-1-A, requires that design changes be treated with the same design control measures as the original design, including appropriate approvals. Commonwealth Edison Quality Assurance Manual procedure 3-51, Attachment A, states that modifications which are temporary alterations, such as blind flanges, will be administratively controlled outside the scope of QP 3-51. Zion Station Administrative Procedure ZAP-0, Conduct of Operations, paragraph 5.3.10, states that temporary alterations, including temporary mechanical system changes such as the installation of blank flanges, shall be conducted in accordance with ZAP 3-51-4.

Contrary to the above, on March 4 through 15, 1988, a temporary alteration was not conducted in accordance with ZAP 3-51-4, in that a blank flange was installed on the supply plenum to the control room charcoal booster fans, and no temporary alteration controls required by ZAP 3-51-4 were used.

#### CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The blank flange had been installed by the Maintenance Department in the process of performing necessary repairs to the OB Control Room Charcoal Booster Fan, which would not start when actuated from the control room. The flange was installed to preclude entry of unfiltered air into the control room makeup air supply through the hole left in the ductwork by removal of the OB fan.

Repairs to the fan were completed, the flange was removed, and the system was declared operable. The PT-14 surveillance "Inoperable and Required Redundant Equipment Surveillance Test Sheet" was closed out on March 31, 1988.

#### CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

Informal discussions were held with all Mechanical Maintenance Department supervisors, specifically covering the requirements of Zion Administrative Procedure ZAP 3-51-4, "Procedures Governing the Use of Temporary Cables, Lifting of Terminated Wires, Bypassing of Alarms, and Installation of Mechanical Blocks or Bypasses". Mechanical Maintenance Supervisors were instructed that blank flanges are within the scope of ZAP 3-51-4, and that in the future blank flanges will be documented via the block/bypass log when required by ZAP 3-51-4.

It was noted that not all flanges constitute alterations to the system. In cases where the flange provides functional isolation, or where it provides a system boundary, the flange is a temporary alteration and shall be reviewed and documented per ZAP 3-51-4. In certain cases, a blank flange is installed on a part of the system that is already isolated, and does not alter the system functionally, but is provided only as a dust cover to maintain the cleanliness of the equipment. In these cases, temporary alteration review and documentation is not required.

As a longer term corrective action, it was noted that installation of blank flanges without the documentation in ZAP 3-51-4 is permitted under certain circumstances. In particular, the use of Temporary Alteration documentation is not required when the installation and removal record is kept as part of an approved procedure, the procedure has a specific sign-off for restoration of the system to normal, and the procedure is reviewed for completeness prior to returning the equipment to an operable condition. Documented discussions shall therefore be held with all Mechanical Maintenance Supervisors, stating that when a blank flange which constitutes a temporary alteration to the system is to be installed, ZAP 3-51-4 requires that the flange be logged in and reviewed as a block, unless the installation is being performed as part of a station approved procedure.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The station will be in full compliance by July 1, 1988.

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