

ZRA97067

November 21, 1997

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

Attention: Document Control Desk

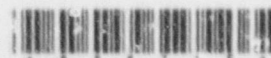
Subject: Response to NRC's Request for Information Regarding an Adverse
Trend in Zion's Configuration Control Processes;
Zion Generating Station, Units 1 & 2;
NRC Docket Numbers 50-295 & 50-304

- References:
1. Letter to J. H. Mueller (ComEd) from G. E. Grant (USNRC), dated August 28, 1997, NRC Inspection Report No. 50-295/97016, 50-304/97016 and Notice of Violation
 2. Letter to USNRC from J. C. Brons (ComEd), dated September 29, 1997, Reply to Notice of Violation in NRC Inspection Report No. 50-295/304-97016
 3. Letter to J. Brons (ComEd) from G. E. Grant (USNRC), dated September 30, 1997, NRC Inspection Report No. 50-295/97019 (DRP), 50-304/97019(DRP) and Notice of Violation
 4. Letter to USNRC from J. C. Brons (ComEd), dated November 3, 1997, Reply to Notice of Violation in NRC Inspection Report No. 50-295/304-97019(DRP)

Gentlemen:

In reference 1, you expressed concern over Zion Station's equipment configuration control processes and requested that ComEd address its (1) action to determine the scope of the configuration control problems; (2) short-term corrective actions to arrest the adverse trend; and (3) long-term corrective actions to prevent recurrence including expected completion dates. The following provides our detailed response as committed to in ComEd's letters to NRC dated September 29 and November 3, 1997, (references 2 and 4, respectively).

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Action(s) to determine the scope of the configuration control problems

As a result of the Operations department identifying out-of-position valves and the NRC's discovery of two valves out-of-position (documented in the August 28, 1997, Inspection Report (reference 1)), the Operations department conducted valve verification on portions of selected systems to determine the extent of the configuration control problem at Zion Station. As a result of this process, additional configuration control problems were discovered, including finding ten valves out of their proper System Operating Instruction (SOI) position. As a result of these findings, a Configuration Control Manager was named to investigate this specific problem and a plant-wide walkdown was conducted to verify the position of valves and proper alignment of systems that are important to the safe shutdown of Unit 2 and the Spent Fuel Pit, and to determine the scope of the configuration control problems at Zion Station.

Using the existing SOIs, a subset of valves that would verify alignment of the systems and valves needed for safe shutdown was identified and on August 13, 1997, the valve alignment verification (*i.e.* walkdown) for safe shutdown configuration control began. Safe shutdown valve lineup was completed on September 2, 1997, at which time valve lineups for startup of Unit 2 were begun with dual verification for valves. The verification results were reviewed by the Shutdown Risk Manager who provided an evaluation to confirm the systems and valves verified on Unit 2 and the Spent Fuel Pit were correct.

As a result of these valve verifications and walkdowns a root cause investigation was conducted. The root cause investigation was completed on October 16, 1997, and it determined that the root cause of Zion's configuration control problem was a lack of clear management expectations for component manipulations and the absence of an SOI valve lineup for all station conditions.

Short-term corrective actions completed

- (1) The Mechanical Maintenance department conducted tailgate sessions to heighten awareness of procedural requirements for peer verification when performing maintenance activities (including valve manipulation) in support of the Operations department. Additionally, Mechanical Maintenance management provided the expectation that maintenance personnel will be assigned to perform the peer verification function for maintenance activities.
- (2) The Operations Manager emphasized the importance of configuration control and adherence to configuration control Station Policy 2-11 to each work group at Zion Station. Management expectations for verification and documentation of any

identified station configuration control problems were communicated to all shifts of the Operations department. Each work group confirmed to the Operations Manager that its people had all been contacted and understood Zion's configuration control policy.

- (3) System Engineering personnel were briefed on the need to ensure that offsite service technicians or visitors, working under their direction at Zion Station, understand current station configuration control rules and policy.

Long-term corrective actions to be completed

Currently, system walkdowns for valves and components required for startup of Unit 2 and the common plant are 99.9% complete, with nine valves remaining to be verified because of outstanding corrective work. Thirty-nine of the 64 SOIs have been revised to show the current plant configuration and identify those valves that are verified for shutdown risk. These 39 SOIs, which will also reference any authorized deviation to that configuration, are currently undergoing on-site review.

Further, administrative control changes have been initiated that include changes in management expectations and policies, and training packages on configuration control are under development for management expectations related to administrative control, station events, and corrective actions. Specific long-term corrective actions are as follows:

- (1) A 100% walkdown with dual verification of valves and components required for startup of Unit 2 and the common plant will be conducted. This action will be completed prior to startup of Unit 2.
- (2) Valve lineup procedure discrepancies, identified in the 100% walkdown and verification of valves and components required for startup of Unit 2 and the common plant, will be corrected. This action will be completed prior to startup of Unit 2.
- (3) Sixty-four SOIs will be revised to show the current plant configuration and identify those valves that are verified for shutdown risk and will reference any authorized deviation to that configuration. This action will be completed prior to startup of Unit 2.
- (4) The Shift Operations Supervisor will revise Station Policy 2-11 to include management expectations for configuration control of components during shutdown and other modes. This will include which departments may manipulate

valves and components and under what conditions. This action will be completed prior to startup of Unit 2.

- (5) The Operations Manager will establish additional management expectations regarding shutdown conditions and the role of System Operating Instructions (SOIs) or other documented methods of configuration deviation. This action will be completed prior to startup of Unit 2.
- (6) The Training department will develop training packages on configuration control that will be given at department tailgate meetings by those departments that bring in offsite service technicians or visitors who may perform work at the station. These training packages will deal with management expectations related to administrative control, station events, and corrective actions. This action will be completed prior to startup of Unit 2.
- (7) The Maintenance Staff department will revise ZAP 200-03, "Control of Non-Station Personnel," to include configuration control policy (Station Policy 2-11) in the requirements for all work performed by onsite non-station personnel. This action will be completed prior to startup of Unit 2.

Upon completion of these ongoing long-term corrective actions, we believe that the potential for future configuration control problems at Zion will be minimized.

The above listings of short-term and long-term corrective actions pertains to actions of a general or programmatic nature that address ComEd's response to NRC (and ComEd) equipment configuration control concerns at Zion Station. Long-term corrective actions (*i.e.*, commitments) are identified in Attachment A to this letter. Additional actions of a more specific nature were provided in ComEd's September 29 and November 3, 1997, letters, in response to individual NRC cited violations in Inspection Report Nos. 50-295/304-97016 and 50-295/304-97019(DRP) (reference 3), respectively.

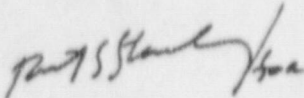
In regard to ComEd's November 3, 1997, Reply to Notice of Violation in NRC Inspection Report No. 50-295/304-97019(DRP) (reference 4), we committed to completion of five actions associated with configuration control. Because of adjustments to the schedule for startup of Unit 2, the commitment date for four of the actions has been changed to "Prior to startup of Unit 2." This change is reflected in long-term corrective action items (2), (3), (4), and (5), above. The previous commitment dates were 12/4/97, 1/1/98, 12/1/97, and 12/4/97, respectively.

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Should you have any questions concerning this response, please contact Robert Godley, Zion Station Regulatory Assurance Manager, at (847)746-2084, extension 2900.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Brons".

John C. Brons
Site Vice President
Zion Generating Station

cc: Regional Administrator, USNRC - Region III
Senior Project Manager, USNRC - NRR Project Directorate III-2
NRC Senior Resident Inspector, Zion Generating Station
Office of Nuclear Facility Safety - IDNS

COMMITMENTS IDENTIFIED IN THIS RESPONSE TO NRC'S REQUEST FOR INFORMATION

The following table identifies those actions committed to by ComEd in this document. Any other actions discussed in this submittal represent intended or planned actions by ComEd. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify Mr. Robert Godley, Zion Station Regulatory Assurance Manager, of any questions regarding this document or any associated regulatory commitments.

Commitment:	Committed Date (or Outage):
A 100% walkdown with dual verification of valves and components required for startup of Unit 2 and the common plant will be conducted.	Prior to startup of Unit 2
Valve lineup procedure discrepancies, identified in the 100% walkdown and verification of valves and components required for startup of Unit 2 and the common plant, will be corrected.	Prior to startup of Unit 2
Sixty-four SOIs will be revised to show the current plant configuration and identify those valves that are verified for shutdown risk and will reference any authorized deviation to that configuration.	Prior to startup of Unit 2
The Shift Operations Supervisor will revise Station Policy 2-11 to include management expectations for configuration control of components during shutdown and other modes. This will include which departments may manipulate valves and components and under what conditions.	Prior to startup of Unit 2
The Operations Manager will establish additional management expectations regarding shutdown conditions and the role of System Operating Instructions (SOIs) or other documented methods of configuration deviation.	Prior to startup of Unit 2
The Training department will develop training packages on configuration control that will be given at department tailgate meetings by those departments that bring in offsite service technicians or visitors who may perform work at the station. These training packages will deal with management expectations related to administrative control, station events, and corrective actions.	Prior to startup of Unit 2
The Maintenance Staff department will revise ZAP 200-03, "Control of Non-Station Personnel," to include configuration control policy (Station Policy 2-11) in the requirements for all work performed by onsite non-station personnel.	Prior to startup of Unit 2