

Commonwealth Edison Company
Zion Generating Station
101 Shiloh Boulevard
Zion, IL 60099-2797
Tel 847-746-2084

ComEd

ZRA97040
September 15, 1997

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

Attention: Document Control Desk

Subject: Commonwealth Edison Reply to Notice of Violation in NRC Inspection
Report Number 50-295/304-97013(DRP);
Zion Nuclear Power Station Units 1 and 2;
NRC Docket Numbers 50-295 and 50-304

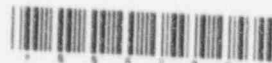
Reference: Letter to J. H. Mueller (ComEd) from G. E. Grant (USNRC) dated August
15, 1997, NRC Inspection Report 50-295/97013, 50-304/97013 and
Notice of Violation

Gentlemen:

By letter dated August 15, 1997, the NRC cited Commonwealth Edison (ComEd) as being in violation of regulatory requirements. The referenced Inspection Report cited three Severity Level IV violations. The first violation involves licensed operators routinely exceeding overtime limitations to accomplish operations department work activities. The second violation involves three examples in which personnel did not perform activities as required by procedures, with two of the examples related to the Unit 1 containment fire. The third violation involves three examples of falsification of records which occurred between May 1994 and October 1995. As discussed in the Notice of Violation (NOV), Zion Station is not required to respond to this third violation since the referenced Inspection Report accurately reflects our corrective actions and position. This letter and its attachments constitute ComEd's reply to the referenced Notice of Violation in accordance with applicable regulations.

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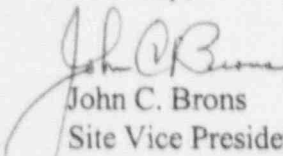
Page 2 of 2

Attachment A to this letter provides the reasons for the violations, the corrective actions taken, and a statement of full compliance. Attachment B to this letter identifies all commitments made by Zion Station in this response.

A response to Example (a) of Violation 50-295(304)/97013-03 is not included in this submittal. ComEd requested an additional week beyond the 30 day response for the above reference in order to prepare a more comprehensive response to this violation example. By discussion with the Region III Branch Chief, the additional time was granted. ComEd will reply to Violation 50-295(304)/97013-03 Example (a) by September 22, 1997.

Should you have any questions concerning this response, please contact Robert Godley of my staff at 847-746-2084 extension 2900.

Sincerely,


John C. Brons
Site Vice President
Zion Nuclear Station

Attachments

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

Response to Notice of Violation in Inspection Report 50-295/304-97013

VIOLATION: 50-295(304)/97013-02

Technical Specification (TS) 6.2.1.i requires that written procedures be prepared, implemented, and maintained for working hours of the Shift Engineer, Shift Control Room Engineer, Shift Foreman, and Nuclear Station Operator such that the heavy use of overtime is not routinely required.

Zion Administrative Procedure 200-01, "Station Organization," Revision 4, Table 1A, clarifies the relationship of TS organization nomenclature to corresponding plant procedure titles. Specifically, TS 6.2.1.i nomenclature refers to the following plant procedure position titles: Shift Manager, Shift Control Room Engineer, Shift Technical Advisor, Unit Supervisor, Licensed Shift Supervisor, and Nuclear Station Operator.

Zion Administrative Procedure 200-04, "Overtime Guidelines," Revision 2, Section F.4.b, requires that unless approval is granted per this procedure, an individual is not permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

Contrary to the above, the inspectors identified that from March 10 through May 18, 1997, overtime in excess of the guidelines without approval was routinely used to accomplish operations department work activities. The inspectors reviewed gatehouse access records for four Shift Managers, three Unit Supervisors, and three Nuclear Station Operators and identified 83 examples of overtime in excess of the guidelines without approval including: one example of an individual working greater than 16 hours in a 24-hour period, three examples of individuals working greater than 72 hours in a 7-day period, and 79 examples of individuals working greater than 24 hours in a 48-hour period, all excluding shift turnover time.

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

ADMISSION OR DENIAL TO THE VIOLATION

ComEd admits the violation.

REASON FOR THE VIOLATION

The reason for this violation is inadequate management oversight in the implementation of the station's overtime guidelines within the Operations Department. Additionally, Operations Senior Management failed to aggressively pursue Site Quality Verification (SQV) identified overtime control issues.

Management's independent investigation of this concern validated the NRC's finding and further identified that a majority of the procedure deviations were isolated to a subset of management individuals. The nature of the deviations involved the failure of these individuals to obtain pre-approval for all overtime deviations, as required by the procedure.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The Operations Manager has personally met with each Shift Manager and other key supervisors to point out their accountability in administering overtime. In addition, to ensure all Operations clearly understand those expectations directly from the Operations Manager a Standing Order was issued.

The Standing Order clarifies past misunderstandings and directs the Supervisor to identify in advance if a shift turnover process will result in exceeding the procedural time constraint of thirteen hours. The offgoing shift personnel are required to obtain Operations Manager's (or his specific designee) pre-approval. The Department Head and Supervisor do not have authority to approve deviations without first obtaining the Operations Manager pre-approval. The Operations Manager will then ensure compliance is in accordance with ZAP 200-04.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

The Operations Manager will verify compliance with ZAP 200-04 by performing weekly 100% samples of Operations Department Management personnel performance as related to ZAP 200-04, including a review of the number of hours worked and the quality of overtime deviations submitted. Deviations of the procedural guidelines will be viewed as personal performance deficiencies and the appropriate actions will be administered. This process will continue until the Operations Manager is satisfied that the problem has been corrected. Weekly random samples will be conducted thereafter, at which point an evaluation will be made on the need to continue or modify the sampling.

An automated system for tracking hours worked by Operations personnel has been developed and is currently undergoing final testing and validation. This system allows for the electronic timekeeping of hours worked (including overtime), and enables management to ascertain violations as well as predict upcoming situations in which an individual employee is at risk to violate the procedural guidelines. This system will be implemented by December 1, 1997.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

VIOLATION: 50-295(304)/97013-03

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and that these activities be accomplished in accordance with these instructions, procedures, or drawings.

Zion Administrative Procedure 900-05, "Control, Use, and Storage of Flammable and Combustible Liquids and Aerosols," Revision 1, Section F.7, requires that adequate natural or mechanical ventilation is ensured in areas where flammable liquids or aerosols are to be used.

Zion Administrative Procedure 400-14, "Equipment and Tool Storage In Safety Related Areas," Revision 0, Attachment B.5, requires that items which do not meet the height-to-width ratio (less than or equal to two) and are not stored in an approved location must be seismically restrained.

Zion Administrative Procedure 900-08, "Station Fire Brigade," Revision 3, Section G.1, requires that any person discovering a fire is to immediately report it to the control room.

Contrary to the above, activities affecting quality were not accomplished in accordance with applicable procedures or instructions in the following instances:

- a. On May 24, 1997, mechanical maintenance personnel did not ensure that adequate natural or mechanical ventilation was established while applying a flammable lubricant to the Unit 1 reactor vessel stud holes; consequently, a flash fire resulted.*
- b. On May 19, 1997, the inspectors identified that a deconning machine and a storage cabinet were not stored in approved locations and did not meet the required height-to-width ratio, nor had the equipment been seismically restrained.*
- c. On May 24, 1997, upon observing a fire in the Unit 1 containment building, a Radiation Protection Technician failed to immediately report the fire to the control room.*

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

ADMISSION OR DENIAL TO THE VIOLATION

ComEd admits the violation.

Violation Example a:

Per discussion with NRC Region III staff, response to this example will be submitted at a later date.

Violation Example b:

REASON FOR THE VIOLATION

The reason for this violation is that little or no training has been provided to Operations, Maintenance, Construction, and Radiation Protection Department personnel regarding the requirements of ZAP 400-14, "Equipment and Tool Storage in Safety Related Areas." A lack of knowledge of the procedural requirements for the temporary storage of equipment and tools in safety related, seismic areas of the plant (among ComEd and contract personnel), resulted in improper storage of the deconning machine and storage cabinet.

Additionally, Attachment C of ZAP 400-14 identifies permissible storage areas and maximum allowable height of stored items for the specific areas, however, the actual plant areas are not identified by floor markings or signs.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The deconning machine and storage cabinet have been relocated to seismically approved locations.

Requests were issued to the Training Department to evaluate to need to perform periodic administrative procedural requirement training as part of the Operations, Maintenance, Construction, and Radiation Protection Department Continuing Training Programs.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

Tailgate sessions will be conducted with personnel from the Operations, Maintenance, Construction, and Radiation Protection Departments to explain the requirements for the temporary storage of equipment and tools in safety related, seismic areas. These sessions will be completed by December 1, 1997.

Storage areas indicated in ZAP 400-14 will be identified with floor markings and signs describing height restrictions for the specific areas by December 1, 1997.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

Violation Example c:

REASON FOR THE VIOLATION

Upon hearing an explosion-type sound, and subsequently determining that there was a fire in the Unit 1 reactor cavity, the Radiation Protection Technician (RPT) felt an overriding sense of urgency to render assistance and to protect the individuals working in the cavity. The RPT knew that his supervisor was available and would be in a position to notify the control room of the fire while he assisted the Mechanical Maintenance workers to safety.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The Radiation Protection Manager conducted tailgate sessions with the Radiation Protection Technicians to discuss the conditions surrounding this event and to stress the importance of immediately reporting the discovery of a fire to the Control Room.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

This event will be covered with Radiation Protection Technicians and Supervisors as part of the operating experience section of the next cycle of Radiation Protection Continuing Training.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

List of Commitments Identified in this Violation Response

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
The Operations Manager will verify compliance with ZAP 200-04 by performing weekly 100% samples of Operations Department Management personnel performance as related to ZAP 200-04, including a review of the number of hours worked and the quality of overtime deviations submitted. Deviations of the procedural guidelines will be viewed as personal performance deficiencies and the appropriate actions will be administered. This process will continue until the Operations Manager is satisfied that the problem has been corrected. Weekly random samples will be conducted thereafter, at which point an evaluation will be made on the need to continue or modify the sampling.	None
An automated system for tracking hours worked by Operations personnel has been developed and is currently undergoing final testing and validation. This system allows for the electronic timekeeping of hours worked (including overtime), and enables management to ascertain violations as well as predict upcoming situations in which an individual employee is at risk to violate the procedural guidelines. This system will be implemented by December 1, 1997.	December 1, 1997
Tailgate sessions will be conducted with personnel from the Operations, Maintenance, Construction, and Radiation Protection Departments to explain the requirements for the temporary storage of equipment and tools in safety related, seismic areas. These sessions will be completed by December 1, 1997.	December 1, 1997
Storage areas indicated in ZAP 400-14 will be identified with floor markings and signs describing height restrictions for the specific areas by December 1, 1997.	December 1, 1997
This event (fire in the Unit 1 reactor cavity) will be covered with Radiation Protection Technicians and Supervisors as part of the operating experience section of the next cycle of Radiation Protection Continuing Training.	None

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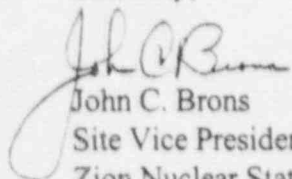
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Attachment A to this letter provides the reasons for the violations, the corrective actions taken, and a statement of full compliance. Attachment B to this letter identifies all commitments made by Zion Station in this response.

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Sincerely,


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VIOLATION: 50-295(304)/97013-02

Technical Specification (TS) 6.2.1.i requires that written procedures be prepared, implemented, and maintained for working hours of the Shift Engineer, Shift Control Room Engineer, Shift Foreman, and Nuclear Station Operator such that the heavy use of overtime is not routinely required.

Zion Administrative Procedure 200-01, "Station Organization," Revision 4, Table 1A, clarifies the relationship of TS organization nomenclature to corresponding plant procedure titles. Specifically, TS 6.2.1.i nomenclature refers to the following plant procedure position titles: Shift Manager, Shift Control Room Engineer, Shift Technical Advisor, Unit Supervisor, Licensed Shift Supervisor, and Nuclear Station Operator.

Zion Administrative Procedure 200-04, "Overtime Guidelines," Revision 2, Section F.4.b, requires that unless approval is granted per this procedure, an individual is not permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

Contrary to the above, the inspectors identified that from March 10 through May 18, 1997, overtime in excess of the guidelines without approval was routinely used to accomplish operations department work activities. The inspectors reviewed gatehouse access records for four Shift Managers, three Unit Supervisors, and three Nuclear Station Operators and identified 83 examples of overtime in excess of the guidelines without approval including: one example of an individual working greater than 16 hours in a 24-hour period, three examples of individuals working greater than 72 hours in a 7-day period, and 79 examples of individuals working greater than 24 hours in a 48-hour period, all excluding shift turnover time.

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

ADMISSION OR DENIAL TO THE VIOLATION

ComEd admits the violation.

REASON FOR THE VIOLATION

The reason for this violation is inadequate management oversight in the implementation of the station's overtime guidelines within the Operations Department. Additionally, Operations Senior Management failed to aggressively pursue Site Quality Verification (SQV) identified overtime control issues.

Management's independent investigation of this concern validated the NRC's finding and further identified that a majority of the procedure deviations were isolated to a subset of management individuals. The nature of the deviations involved the failure of these individuals to obtain pre-approval for all overtime deviations, as required by the procedure.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The Operations Manager has personally met with each Shift Manager and other key supervisors to point out their accountability in administering overtime. In addition, to ensure all Operations clearly understand those expectations directly from the Operations Manager a Standing Order was issued.

The Standing Order clarifies past misunderstandings and directs the Supervisor to identify in advance if a shift turnover process will result in exceeding the procedural time constraint of thirteen hours. The offgoing shift personnel are required to obtain Operations Manager's (or his specific designee) pre-approval. The Department Head and Supervisor do not have authority to approve deviations without first obtaining the Operations Manager pre-approval. The Operations Manager will then ensure compliance is in accordance with ZAP 200-04.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

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DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

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- b. On May 19, 1997, the inspectors identified that a deconning machine and a storage cabinet were not stored in approved locations and did not meet the required height-to-width ratio, nor had the equipment been seismically restrained.*
- c. On May 24, 1997, upon observing a fire in the Unit 1 containment building, a Radiation Protection Technician failed to immediately report the fire to the control room.*

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

ADMISSION OR DENIAL TO THE VIOLATION

ComEd admits the violation.

Violation Example a:

Per discussion with NRC Region III staff, response to this example will be submitted at a later date.

Violation Example b:

REASON FOR THE VIOLATION

The reason for this violation is that little or no training has been provided to Operations, Maintenance, Construction, and Radiation Protection Department personnel regarding the requirements of ZAP 400-14, "Equipment and Tool Storage in Safety Related Areas." A lack of knowledge of the procedural requirements for the temporary storage of equipment and tools in safety related, seismic areas of the plant (among ComEd and contract personnel), resulted in improper storage of the deconning machine and storage cabinet.

Additionally, Attachment C of ZAP 400-14 identifies permissible storage areas and maximum allowable height of stored items for the specific areas, however, the actual plant areas are not identified by floor markings or signs.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The deconning machine and storage cabinet have been relocated to seismically approved locations.

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CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

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Storage areas indicated in ZAP 400-14 will be identified with floor markings and signs describing height restrictions for the specific areas by December 1, 1997.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

Violation Example c:

REASON FOR THE VIOLATION

Upon hearing an explosion-type sound, and subsequently determining that there was a fire in the Unit 1 reactor cavity, the Radiation Protection Technician (RPT) felt an overriding sense of urgency to render assistance and to protect the individuals working in the cavity. The RPT knew that his supervisor was available and would be in a position to notify the control room of the fire while he assisted the Mechanical Maintenance workers to safety.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The Radiation Protection Manager conducted tailgate sessions with the Radiation Protection Technicians to discuss the conditions surrounding this event and to stress the importance of immediately reporting the discovery of a fire to the Control Room.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

This event will be covered with Radiation Protection Technicians and Supervisors as part of the operating experience section of the next cycle of Radiation Protection Continuing Training.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

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List of Commitments Identified in this Violation Response

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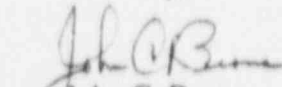
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Response to Notice of Violation in Inspection Report 50-295/304-97013

VIOLATION: 50-295(304)/97013-02

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Zion Administrative Procedure 200-04, "Overtime Guidelines," Revision 2, Section F.4.b, requires that unless approval is granted per this procedure, an individual is not permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

Contrary to the above, the inspectors identified that from March 10 through May 18, 1997, overtime in excess of the guidelines without approval was routinely used to accomplish operations department work activities. The inspectors reviewed gatehouse access records for four Shift Managers, three Unit Supervisors, and three Nuclear Station Operators and identified 83 examples of overtime in excess of the guidelines without approval including: one example of an individual working greater than 16 hours in a 24-hour period, three examples of individuals working greater than 72 hours in a 7-day period, and 79 examples of individuals working greater than 24 hours in a 48-hour period, all excluding shift turnover time.

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

ADMISSION OR DENIAL TO THE VIOLATION

ComEd admits the violation.

REASON FOR THE VIOLATION

The reason for this violation is inadequate management oversight in the implementation of the station's overtime guidelines within the Operations Department. Additionally, Operations Senior Management failed to aggressively pursue Site Quality Verification (SQV) identified overtime control issues.

Management's independent investigation of this concern validated the NRC's finding and further identified that a majority of the procedure deviations were isolated to a subset of management individuals. The nature of the deviations involved the failure of these individuals to obtain pre-approval for all overtime deviations, as required by the procedure.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The Operations Manager has personally met with each Shift Manager and other key supervisors to point out their accountability in administering overtime. In addition, to ensure all Operations clearly understand those expectations directly from the Operations Manager a Standing Order was issued.

The Standing Order clarifies past misunderstandings and directs the Supervisor to identify in advance if a shift turnover process will result in exceeding the procedural time constraint of thirteen hours. The offgoing shift personnel are required to obtain Operations Manager's (or his specific designee) pre-approval. The Department Head and Supervisor do not have authority to approve deviations without first obtaining the Operations Manager pre-approval. The Operations Manager will then ensure compliance is in accordance with ZAP 200-04.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

The Operations Manager will verify compliance with ZAP 200-04 by performing weekly 100% samples of Operations Department Management personnel performance as related to ZAP 200-04, including a review of the number of hours worked and the quality of overtime deviations submitted. Deviations of the procedural guidelines will be viewed as personal performance deficiencies and the appropriate actions will be administered. This process will continue until the Operations Manager is satisfied that the problem has been corrected. Weekly random samples will be conducted thereafter, at which point an evaluation will be made on the need to continue or modify the sampling.

An automated system for tracking hours worked by Operations personnel has been developed and is currently undergoing final testing and validation. This system allows for the electronic timekeeping of hours worked (including overtime), and enables management to ascertain violations as well as predict upcoming situations in which an individual employee is at risk to violate the procedural guidelines. This system will be implemented by December 1, 1997.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

VIOLATION: 50-295(304)/97013-03

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and that these activities be accomplished in accordance with these instructions, procedures, or drawings.

Zion Administrative Procedure 900-05, "Control, Use, and Storage of Flammable and Combustible Liquids and Aerosols," Revision 1, Section F.7, requires that adequate natural or mechanical ventilation is ensured in areas where flammable liquids or aerosols are to be used.

Zion Administrative Procedure 400-14, "Equipment and Tool Storage In Safety Related Areas," Revision 0, Attachment B.5, requires that items which do not meet the height-to-width ratio (less than or equal to two) and are not stored in an approved location must be seismically restrained.

Zion Administrative Procedure 900-08, "Station Fire Brigade," Revision 3, Section G.1, requires that any person discovering a fire is to immediately report it to the control room.

Contrary to the above, activities affecting quality were not accomplished in accordance with applicable procedures or instructions in the following instances:

- a. On May 24, 1997, mechanical maintenance personnel did not ensure that adequate natural or mechanical ventilation was established while applying a flammable lubricant to the Unit 1 reactor vessel stud holes; consequently, a flash fire resulted.*
- b. On May 19, 1997, the inspectors identified that a deconning machine and a storage cabinet were not stored in approved locations and did not meet the required height-to-width ratio, nor had the equipment been seismically restrained.*
- c. On May 24, 1997, upon observing a fire in the Unit 1 containment building, a Radiation Protection Technician failed to immediately report the fire to the control room.*

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

ADMISSION OR DENIAL TO THE VIOLATION

ComEd admits the violation.

Violation Example a:

Per discussion with NRC Region III staff, response to this example will be submitted at a later date.

Violation Example b:

REASON FOR THE VIOLATION

The reason for this violation is that little or no training has been provided to Operations, Maintenance, Construction, and Radiation Protection Department personnel regarding the requirements of ZAP 400-14, "Equipment and Tool Storage in Safety Related Areas." A lack of knowledge of the procedural requirements for the temporary storage of equipment and tools in safety related, seismic areas of the plant (among ComEd and contract personnel), resulted in improper storage of the deconning machine and storage cabinet.

Additionally, Attachment C of ZAP 400-14 identifies permissible storage areas and maximum allowable height of stored items for the specific areas, however, the actual plant areas are not identified by floor markings or signs.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The deconning machine and storage cabinet have been relocated to seismically approved locations.

Requests were issued to the Training Department to evaluate to need to perform periodic administrative procedural requirement training as part of the Operations, Maintenance, Construction, and Radiation Protection Department Continuing Training Programs.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

Tailgate sessions will be conducted with personnel from the Operations, Maintenance, Construction, and Radiation Protection Departments to explain the requirements for the temporary storage of equipment and tools in safety related, seismic areas. These sessions will be completed by December 1, 1997.

Storage areas indicated in ZAP 400-14 will be identified with floor markings and signs describing height restrictions for the specific areas by December 1, 1997.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

Violation Example c:

REASON FOR THE VIOLATION

Upon hearing an explosion-type sound, and subsequently determining that there was a fire in the Unit 1 reactor cavity, the Radiation Protection Technician (RPT) felt an overriding sense of urgency to render assistance and to protect the individuals working in the cavity. The RPT knew that his supervisor was available and would be in a position to notify the control room of the fire while he assisted the Mechanical Maintenance workers to safety.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The Radiation Protection Manager conducted tailgate sessions with the Radiation Protection Technicians to discuss the conditions surrounding this event and to stress the importance of immediately reporting the discovery of a fire to the Control Room.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

This event will be covered with Radiation Protection Technicians and Supervisors as part of the operating experience section of the next cycle of Radiation Protection Continuing Training.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

List of Commitments Identified in this Violation Response

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
<p>The Operations Manager will verify compliance with ZAP 200-04 by performing weekly 100% samples of Operations Department Management personnel performance as related to ZAP 200-04, including a review of the number of hours worked and the quality of overtime deviations submitted. Deviations of the procedural guidelines will be viewed as personal performance deficiencies and the appropriate actions will be administered. This process will continue until the Operations Manager is satisfied that the problem has been corrected. Weekly random samples will be conducted thereafter, at which point an evaluation will be made on the need to continue or modify the sampling.</p>	None
<p>An automated system for tracking hours worked by Operations personnel has been developed and is currently undergoing final testing and validation. This system allows for the electronic timekeeping of hours worked (including overtime), and enables management to ascertain violations as well as predict upcoming situations in which an individual employee is at risk to violate the procedural guidelines. This system will be implemented by December 1, 1997.</p>	December 1, 1997
<p>Tailgate sessions will be conducted with personnel from the Operations, Maintenance, Construction, and Radiation Protection Departments to explain the requirements for the temporary storage of equipment and tools in safety related, seismic areas. These sessions will be completed by December 1, 1997.</p>	December 1, 1997
<p>Storage areas indicated in ZAP 400-14 will be identified with floor markings and signs describing height restrictions for the specific areas by December 1, 1997.</p>	December 1, 1997
<p>This event (fire in the Unit 1 reactor cavity) will be covered with Radiation Protection Technicians and Supervisors as part of the operating experience section of the next cycle of Radiation Protection Continuing Training.</p>	None



ZRA97040

September 15, 1997

U. S. Nuclear Regulatory Commission

Washington, D.C. 20555

Attention: Document Control Desk

Subject: Commonwealth Edison Reply to Notice of Violation in NRC Inspection Report Number 50-295/304-97013(DRP);
Zion Nuclear Power Station Units 1 and 2;
NRC Docket Numbers 50-295 and 50-304

Reference: Letter to J. H. Mueller (ComEd) from G. E. Grant (USNRC) dated August 15, 1997. NRC Inspection Report 50-295/97013, 50-304/97013 and Notice of Violation

Gentlemen:

By letter dated August 15, 1997, the NRC cited Commonwealth Edison (ComEd) as being in violation of regulatory requirements. The referenced Inspection Report cited three Severity Level IV violations. The first violation involves licensed operators routinely exceeding overtime limitations to accomplish operations department work activities. The second violation involves three examples in which personnel did not perform activities as required by procedures, with two of the examples related to the Unit 1 containment fire. The third violation involves three examples of falsification of records which occurred between May 1994 and October 1995. As discussed in the Notice of Violation (NOV), Zion Station is not required to respond to this third violation since the referenced Inspection Report accurately reflects our corrective actions and position. This letter and its attachments constitute ComEd's reply to the referenced Notice of Violation in accordance with applicable regulations.

ZRA97040

September 15, 1997

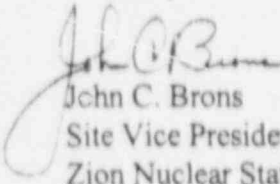
Page 2 of 2

Attachment A to this letter provides the reasons for the violations, the corrective actions taken, and a statement of full compliance. Attachment B to this letter identifies all commitments made by Zion Station in this response.

A response to Example (a) of Violation 50-295(304)/97013-03 is not included in this submittal. ComEd requested an additional week beyond the 30 day response for the above reference in order to prepare a more comprehensive response to this violation example. By discussion with the Region III Branch Chief, the additional time was granted. ComEd will reply to Violation 50-295(304)/97013-03 Example (a) by September 22, 1997.

Should you have any questions concerning this response, please contact Robert Godley of my staff at 847-746-2084 extension 2900.

Sincerely,



John C. Brons
Site Vice President
Zion Nuclear Station

Attachments

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

Response to Notice of Violation in Inspection Report 50-295/304-97013

VIOLATION: 50-295(304)/97013-02

Technical Specification (TS) 6.2.1.1 requires that written procedures be prepared, implemented, and maintained for working hours of the Shift Engineer, Shift Control Room Engineer, Shift Foreman, and Nuclear Station Operator such that the heavy use of overtime is not routinely required.

Zion Administrative Procedure 200-01, "Station Organization," Revision 4, Table 1A, clarifies the relationship of TS organization nomenclature to corresponding plant procedure titles. Specifically, TS 6.2.1.1 nomenclature refers to the following plant procedure position titles: Shift Manager, Shift Control Room Engineer, Shift Technical Advisor, Unit Supervisor, Licensed Shift Supervisor, and Nuclear Station Operator.

Zion Administrative Procedure 200-04, "Overtime Guidelines," Revision 2, Section F.4.b, requires that unless approval is granted per this procedure, an individual is not permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

Contrary to the above, the inspectors identified that from March 10 through May 18, 1997, overtime in excess of the guidelines without approval was routinely used to accomplish operations department work activities. The inspectors reviewed gatehouse access records for four Shift Managers, three Unit Supervisors, and three Nuclear Station Operators and identified 83 examples of overtime in excess of the guidelines without approval including: one example of an individual working greater than 16 hours in a 24-hour period, three examples of individuals working greater than 72 hours in a 7-day period, and 79 examples of individuals working greater than 24 hours in a 48-hour period, all excluding shift turnover time.

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

ADMISSION OR DENIAL TO THE VIOLATION

ComEd admits the violation.

REASON FOR THE VIOLATION

The reason for this violation is inadequate management oversight in the implementation of the station's overtime guidelines within the Operations Department. Additionally, Operations Senior Management failed to aggressively pursue Site Quality Verification (SQV) identified overtime control issues.

Management's independent investigation of this concern validated the NRC's finding and further identified that a majority of the procedure deviations were isolated to a subset of management individuals. The nature of the deviations involved the failure of these individuals to obtain pre-approval for all overtime deviations, as required by the procedure.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The Operations Manager has personally met with each Shift Manager and other key supervisors to point out their accountability in administering overtime. In addition, to ensure all Operations clearly understand those expectations directly from the Operations Manager a Standing Order was issued.

The Standing Order clarifies past misunderstandings and directs the Supervisor to identify in advance if a shift turnover process will result in exceeding the procedural time constraint of thirteen hours. The offgoing shift personnel are required to obtain Operations Manager's (or his specific designee) pre-approval. The Department Head and Supervisor do not have authority to approve deviations without first obtaining the Operations Manager pre-approval. The Operations Manager will then ensure compliance is in accordance with ZAP 200-04.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

The Operations Manager will verify compliance with ZAP 200-04 by performing weekly 100% samples of Operations Department Management personnel performance as related to ZAP 200-04, including a review of the number of hours worked and the quality of overtime deviations submitted. Deviations of the procedural guidelines will be viewed as personal performance deficiencies and the appropriate actions will be administered. This process will continue until the Operations Manager is satisfied that the problem has been corrected. Weekly random samples will be conducted thereafter, at which point an evaluation will be made on the need to continue or modify the sampling.

An automated system for tracking hours worked by Operations personnel has been developed and is currently undergoing final testing and validation. This system allows for the electronic timekeeping of hours worked (including overtime), and enables management to ascertain violations as well as predict upcoming situations in which an individual employee is at risk to violate the procedural guidelines. This system will be implemented by December 1, 1997.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

VIOLATION: 50-295(304)/97013-03

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and that these activities be accomplished in accordance with these instructions, procedures, or drawings.

Zion Administrative Procedure 900-05, "Control, Use, and Storage of Flammable and Combustible Liquids and Aerosols," Revision 1, Section F.7, requires that adequate natural or mechanical ventilation is ensured in areas where flammable liquids or aerosols are to be used.

Zion Administrative Procedure 400-14, "Equipment and Tool Storage In Safety Related Areas," Revision 0, Attachment B.5, requires that items which do not meet the height-to-width ratio (less than or equal to two) and are not stored in an approved location must be seismically restrained.

Zion Administrative Procedure 900-08, "Station Fire Brigade," Revision 3, Section G.1, requires that any person discovering a fire is to immediately report it to the control room.

Contrary to the above, activities affecting quality were not accomplished in accordance with applicable procedures or instructions in the following instances:

- a. On May 24, 1997, mechanical maintenance personnel did not ensure that adequate natural or mechanical ventilation was established while applying a flammable lubricant to the Unit 1 reactor vessel stud holes; consequently, a flash fire resulted.*
- b. On May 19, 1997, the inspectors identified that a deconning machine and a storage cabinet were not stored in approved locations and did not meet the required height-to-width ratio, nor had the equipment been seismically restrained.*
- c. On May 24, 1997, upon observing a fire in the Unit 1 containment building, a Radiation Protection Technician failed to immediately report the fire to the control room.*

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

ADMISSION OR DENIAL TO THE VIOLATION

ComEd admits the violation.

Violation Example a:

Per discussion with NRC Region III staff, response to this example will be submitted at a later date.

Violation Example b:

REASON FOR THE VIOLATION

The reason for this violation is that little or no training has been provided to Operations, Maintenance, Construction, and Radiation Protection Department personnel regarding the requirements of ZAP 400-14, "Equipment and Tool Storage in Safety Related Areas." A lack of knowledge of the procedural requirements for the temporary storage of equipment and tools in safety related, seismic areas of the plant (among ComEd and contract personnel), resulted in improper storage of the deconning machine and storage cabinet.

Additionally, Attachment C of ZAP 400-14 identifies permissible storage areas and maximum allowable height of stored items for the specific areas, however, the actual plant areas are not identified by floor markings or signs.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The deconning machine and storage cabinet have been relocated to seismically approved locations.

Requests were issued to the Training Department to evaluate to need to perform periodic administrative procedural requirement training as part of the Operations, Maintenance, Construction, and Radiation Protection Department Continuing Training Programs.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

Tailgate sessions will be conducted with personnel from the Operations, Maintenance, Construction, and Radiation Protection Departments to explain the requirements for the temporary storage of equipment and tools in safety related, seismic areas. These sessions will be completed by December 1, 1997.

Storage areas indicated in ZAP 400-14 will be identified with floor markings and signs describing height restrictions for the specific areas by December 1, 1997.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

Violation Example c:

REASON FOR THE VIOLATION

Upon hearing an explosion-type sound, and subsequently determining that there was a fire in the Unit 1 reactor cavity, the Radiation Protection Technician (RPT) felt an overriding sense of urgency to render assistance and to protect the individuals working in the cavity. The RPT knew that his supervisor was available and would be in a position to notify the control room of the fire while he assisted the Mechanical Maintenance workers to safety.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The Radiation Protection Manager conducted tailgate sessions with the Radiation Protection Technicians to discuss the conditions surrounding this event and to stress the importance of immediately reporting the discovery of a fire to the Control Room.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

This event will be covered with Radiation Protection Technicians and Supervisors as part of the operating experience section of the next cycle of Radiation Protection Continuing Training.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.

List of Commitments Identified in this Violation Response

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
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An automated system for tracking hours worked by Operations personnel has been developed and is currently undergoing final testing and validation. This system allows for the electronic timekeeping of hours worked (including overtime), and enables management to ascertain violations as well as predict upcoming situations in which an individual employee is at risk to violate the procedural guidelines. This system will be implemented by December 1, 1997.	December 1, 1997
Tailgate sessions will be conducted with personnel from the Operations, Maintenance, Construction, and Radiation Protection Departments to explain the requirements for the temporary storage of equipment and tools in safety related, seismic areas. These sessions will be completed by December 1, 1997.	December 1, 1997
Storage areas indicated in ZAP 400-14 will be identified with floor markings and signs describing height restrictions for the specific areas by December 1, 1997.	December 1, 1997
This event (fire in the Unit 1 reactor cavity) will be covered with Radiation Protection Technicians and Supervisors as part of the operating experience section of the next cycle of Radiation Protection Continuing Training	None