



**Commonwealth Edison**

72 West Adams Street, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690 - 0767

DCB

April 10, 1989

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  
License Nos. DPR-39 and DPR-48  
Response to Inspection Report Nos. 50-295/80002  
and 50-304/89002  
NRC Docket Nos. 50-295 and 50-304

Reference: March 10, 1989 letter from E.G. Greenman to Cordell Reed

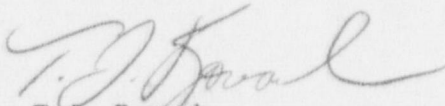
Dear Mr. Davis:

This letter is in response to the inspection conducted by Mr. M. Holzmer, Ms. P. Eng and other personnel of your staff during the period of January 4 through February 17, 1989 of activities at the Zion Nuclear Power Station. During this inspection, certain activities appeared to be in violation of NRC requirements. The response to the violations are provided in the Attachment to this letter.

Your cover letter also expressed a concern about the apparent lack of communications between Zion plant management and plant staff, most notably, the station operators. It is my understanding that Mr. Cordell Reed is intending to address these issues with Mr. E. Greenman in the near future.

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

Very truly yours,

  
T.J. Koyach  
Nuclear Licensing Manager

/scl:0074T:l

cc: NRC Resident Inspector

8904270421 890410  
PDR ADOCK 05000295  
Q PNU

IEC1  
11  
APR 11 1989

## ATTACHMENT

### 1. Violation:

10 CFR 50, Appendix B, Criterion XI, as implemented by Commonwealth Edison Company's Quality Assurance Topical Report, CE-I-A, and Zion Administrative Procedure 10-53-1, "Inspection Plan - Surveillance," requires in part that test procedures record the as-found condition.

Contrary to the above, on May 24, August 7, December 13, 1988, and on July 9, September 24, December 28, 1988, the licensee performed test procedure PT-7B, "Aux Feedwater Pumps Service Water Valves Operability Checks," on Units 1 and 2, respectively, which required that valve stems for valves SW 101, 102, 103, 104 and 105 be "Neo-lubed" prior to stroke timing the valves thereby failing to obtain the as-found stroke time.

This is a Severity Level IV violation (Supplement I (295/89002-02 304/89002-02 [DRP])).

### Corrective Actions Taken and Results Achieved:

The lubrication procedures reflected in PT-7B have been carefully reviewed. This review focuses both on the need for an effective preventative maintenance program and the larger goal of preserving "as-found" data.

The valves listed in PT-7B are stroke timed from the closed to the open position. The intent of valve stem lubrication as it existed in this procedure was to reduce friction through the valve packing area. However, the lubrication was applied to the portion of the valve stem between the valve packing and the motor operator with the valve closed. Therefore, when stroked open, the lubrication would have minimal impact on timing because the lubricated portion of the stem was moving away from the valve packing instead of through the packing. The ineffectiveness of this lubrication procedure inadvertently resulted in true "as-found" stroke timings being obtained.

Test procedure PT-7B has been revised taking into account the need to maintain both an effective preventative maintenance program and to preserve "as-found" data. The step which required the Operator to lubricate the valve stems prior to stroke timing has been removed. Steps to provide lubrication to the portion of the valve stem which travels through the packing have been included. This lubrication is performed after stroke times are obtained and before the valves are returned to the closed position. This procedure revision was completed on March 23, 1989.

Zion Station recognizes the need to obtain accurate "as-found" data when performing operability tests. To that end ZAP 5-51-3A "Use of Procedures in Operating Department" has been revised to include a section which defines test preconditioning. This section states that Operators should be aware of the fact that actions required during performance of a procedure could affect "as found" data and may invalidate test results. Should the Operator discover such a condition, the Operator must notify a Licensed Supervisor.

### Corrective Action To Be Taken To Prevent Recurrence:

ZAP 5-51-5 "Procedure Content and Format" will be revised to instruct procedure writers for all station procedures to ensure that steps which could "precondition" a test are not included in any procedure.

Date When Full Compliance Will Be Achieved:

The revision to ZAP 5-51-5 will be completed by June 1, 1989.

2. Violation:

Technical Specification 3.0.4 requires that entry into an operational mode shall not be made unless the conditions of the Limiting Condition for Operation (LCO) are met without reliance on provisions contained in the Action Statements.

Contrary to the above, Unit 2 entered Mode 2 on December 26, 1988, and Mode 1 on December 28, 1988, while the LCO of TS 3.3.1.F was met with reliance on the Action Statement of TS 3.3.1.F.b. TS 3.3.1.F. requires that in Modes 1, 2, or 3, two power operated relief valve block valves be operable. The LCO was met by complying with the Action Statement which required closing and de-energizing power operated relief valve (PORV) block valve 2MOV-RC8000B which had been declared inoperable on December 21, 1989 while the unit was in Mode 3.

This is a Severity Level IV violation.

Corrective Action Taken and Results Achieved:

All Senior Reactor Operator licensed management personnel will be trained on the proper interpretation of Technical Specification 3.0.4. The training will stress that entry into an operational mode is prohibited when any Limiting Condition for Operation can be met only by relying on the Action Statement unless specifically allowed, regardless of whether or not a time limit is specified.

A proposed Technical Specification Change will be submitted, modifying General Surveillance Requirements 4.0.3 and 4.0.4 per the guidance provided in NRC Generic Letter 87-09, and exempting the LCO for Technical Specifications 3.3.1.F from the provisions of General LCO 3.0.4. After further review of Technical Specifications, the station has chosen to request this same exemption for TS 3.9.3A, which covers Containment Isolation Valves.

Date When Full Compliance Will Be Achieved:

Zion Station will be in full compliance by August 1, 1989.