

NOTICE OF VIOLATION

Commonwealth Edison Company
Zion Nuclear Generating Station

Docket Nos. 50-295; 50-304
License Nos. DPR-39; DPR-48

During an NRC inspection conducted on July 13 through August 29, 1996, four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Procedure ZRP 5820-12, "Out of Service Surveillance for Radiation Monitors," Revision 4, requires implementation of Technical Specification action statements for inoperable radiation monitors.

Technical Specification Table 3.14, "Radiation, Monitoring Instrumentation," requires that with radiation monitor 2R-AR03 inoperable an alternate method of monitoring containment be initiated within 72 hours.

Procedure, FHI-02, "Handling of Shipping Containers and Site Removal of New Fuel Assemblies From Shipping Containers and Inspection of New Fuel," Revision 2, Step 9, requires that the fuel handling crew slowly lift one end of the shipping container for new fuel assemblies being moved with the overhead crane using a minimum rated two ton nylon sling, until the lateral lock tubes slide into their support housing.

Contrary to the above,

- a. On July 26, 1996, ZRP 5820-12 was not appropriate to the circumstances, in that it stated that an alternate method of monitoring containment within 72 hours with radiation monitor ZR-AR03 inoperable was not required, when an alternate method was required by TS Table 3.14.
- b. On July 30, 1996, FHI-02, Step 9, was not appropriate to the circumstances, in that it did not specify how to properly rig the shipping container for the lift. Consequently, personnel inadvertently dropped a shipping container with two new fuel assemblies, during new fuel assembly receipt inspection.

This is a Severity Level IV Violation (Supplement IV).

2. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Procedure SOI-67F1, "Liquid Waste Disposal OB Lake Discharge Tank Through Unit 1 Canal," Revision 4, required the locking and verification of valve, OWD-0118, "Lake Discharge Tank Inlet Isolation Valve," after sampling of the OB Lake Discharge Tank was completed.

Contrary to the above, on August 16, 1996, a non-licensed operator failed to follow SOI-67F1 and did not close and verify valve, OWD-0118, "Lake Discharge Tank Inlet Isolation Valve." This resulted in approximately 7000 gallons of slightly contaminated water being pumped onto the floor at the 542 foot level of the auxiliary building.

This is a Severity Level IV Violation (Supplement IV).

3. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," states that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, inadequate corrective actions were taken after the licensee identified a scaffold interference with the Unit 1 turbine stop valves on June 17, 1996. As a result, on August 5, 1996, the inspectors identified that a scaffold around the 1B containment spray pump obstructed operation of the 1B containment spray discharge valve.

This is a Severity Level IV Violation (Supplement IV).

4. 10 CFR Part 50, Appendix B, Criterion XVII, "Quality Assurance Records," requires in part that sufficient records shall be maintained to furnish evidence of activities affecting quality and that the records shall record the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted.

Contrary to the above, on August 16, inspectors identified that a missing part and an inadequately secured part had not been documented in the as-found condition portion of the work package for the 1B CCP shaft driven oil pump.

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting the Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of

Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in the Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

The NRC has concluded that information regarding the reason for the l.c. violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance is already adequately addressed on the docket in the licensee's response to Inspection Report Number 50-295/304-96007 dated September 27, 1996. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

Dated at Lisle, Illinois,
this 22 day of October 1996