

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 June 8 through July 26, 1996, four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 95 FR-1592, June 29, 1995, the violations are listed below:

1. 10 CFR 50.54(l), "Conditions of Licenses," requires, in part, that the licensee shall designate individuals, licensed as senior operators pursuant to Part 55, to be responsible for directing the licensed activities of licensed operators.

10 CFR 55.53.(e), "Conditions of Licenses," requires in part, that to maintain active status, the licensee licensed operator shall actively perform the functions of an operator or senior operator on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter.

10 CFR 55.4, "Definitions," defines actively performing the functions of an operator or senior operator to mean that an individual has a position on the shift crew that requires the individual to be licensed as defined in the facility's technical specifications, and that the individual carries out and is responsible for the duties covered by that position.

10 CFR 55.53(f) requires, in part, that if paragraph 55.53(e) is not met then before resumption of functions authorized by a license issued under this part an authorized representative of the facility licensee shall certify that the licensee has completed a minimum of 40 hours of shift functions under the direction of an operator or senior operator as appropriate and in the position to which the individual will be assigned.

Contrary to the above, during the first, second, and fourth quarters of 1994, the licensee designated individuals to be responsible for directing the licensed activities of licensed operators, who were not licensed as senior operators pursuant to 10 CFR Part 55, in that they had not maintained active status (i.e., actively performed the functions of an operator or senior operator a minimum of seven 8-hour or five 12-hour shifts per calendar quarter).

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

2. 10 CFR 50, Appendix B, Criterion 16, requires, in part, 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, the system engineer did not take prompt action to address and correct a puncture hole in the exhaust ventilation duct from the holdup tank room, until prompted by the inspectors on July 8.

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

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3. 10 CFR 50.71(e)(4) requires, in part, that revisions of the Final Safety Analysis Report (FSAR) must be filed annually or 6 months after each refueling outage and the revisions must reflect all changes up to a maximum of 6 months prior to the date of filing.

Contrary to the above, the licensee changed the spent fuel pool arrangement described in section 15.7.4.1 of the UFSAR in August 1993 and had not incorporated this change into the UFSAR as of August 30, 1996, which was greater than six months after the refueling outage immediately subsequent to the change.

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

4. Technical Specification 6.2.2.A requires, in part, that radiation control procedures be prepared and implemented, which are consistent with the requirements of 10 CFR 20.

Zion Administrative Procedure 620-03, "Transportation, Conditional, and Unconditional Release of Radioactive Materials," Revision 2, requires that any item removed from a contaminated area shall be properly packaged to prevent the spread of contamination or surveyed to ensure it is not contaminated.

Contrary to the above, on July 9, 1996, chemistry technicians removed materials from the primary sample room, a contaminated area, without performing a contamination survey of the material and without packaging the material to prevent the spread of contamination.

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

5. 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.

- a. Zion Administrative Procedure 900-02, "Fire Protection System Impairments," Revision 2, required a Barrier Impairment Permit when fire protection equipment was impaired.

Contrary to the above, on July 1, no Barrier Impairment Permit was initiated when the carbon dioxide (CO₂) fire suppression system for the 1A emergency diesel generator room was made inoperable during replacement of a discharge timer in the system.

- b. Zion Administrative Procedure, ZAP 700-08, "Problem Identification Process," Revision 10, required that a problem identification form (PIF) be generated within 48 hours of discovering an equipment status control discrepancy.

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Contrary to the above, fire protection personnel did not generate a PIF within 48 hours (by July 3) after discovering an equipment status control discrepancy, namely, a Barrier Impairment Permit for the CO₂ timer replacement work or for the practice of rendering the CO₂ system inoperable when issuing the CO₂ lockout key.

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

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.