

PUBLIC

IE-01

January 28, 1997

Mr. J. H. Mueller
Site Vice President
Zion Station
Commonwealth Edison Company
101 Shiloh Boulevard
Zion, IL 60099

SUBJECT: NRC INSPECTION REPORT 50-295/96-14, 50-304/96-14 AND
NOTICE OF VIOLATION

Dear Mr. Mueller:

On October 11, 1996, the NRC completed an inspection at your Zion 1 and 2 reactor facilities. The enclosed report presents the results of that inspection.

During this seven-week inspection period, operational performance was inconsistent and characterized by frequent operational events, several of which resulted in inadvertent limiting conditions for operation (LCO) entries. The previously identified trends of personal errors resulting from inattention to detail, lack of a questioning attitude, insufficient self-checking, and the failure to follow procedures combined with weak procedures, continued.

Additionally, we are concerned about six violations of NRC requirements that were identified. The first violation involves five examples of failure to follow procedures. The second violation pertains to the failure to stop withdrawing control rods and enter an abnormal operating procedure when control board rod position indication indicated rod misalignment greater than allowed by Technical Specifications (TS). The third violation involves the failure to comply with TS action statements within the required time frame when the 2A and 2B emergency diesel generators were inoperable. The fourth violation involves four examples of inadequate procedures. The fifth violation pertains to the failure to conduct an independent quality control inspection during reassembly of the 2B emergency diesel generator jacket water cooler. The sixth violation involves inadequate design control when inspectors observed a portable fan taped to the Unit 2 manipulator crane over the refueling cavity while fuel assemblies were being moved.

These violations are cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding the violations are described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response.

During the public meeting conducted on September 6, 1996, and in your response dated September 27, 1996, to the Notice of Violation and Proposed Imposition of Civil Penalty - \$50,000 (NRC Inspection Report Nos. 50-295/304/96007(DRP)),

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you described your corrective actions to improve operations performance. Your corrective actions included an operations performance plan which contained the following near term goals: (1) no missed surveillance tests, (2) no inadvertent LCO entries, (3) no mode changes while in an LCO, and (4) no events due to component mispositioning. It is evident by the events of this inspection period that your corrective actions have been ineffective, as you repeatedly failed to achieve three of your four near term goals. In addition, your response indicated that your performance plan had five broad strategies including surveillance program management, schedule management, plant procedures, configuration control, and material condition. However, it was not clear in your response how these strategies would be implemented and when the various aspects of the plan would be completed.

Therefore, in addition to the response required by the Notice, please provide the following information: (1) your short term corrective actions to arrest the trend of inconsistent performance, including missed surveillances, inadvertent entries into LCOs, and events due to failure to follow procedures and loss of configuration control; (2) your actions to address the trend of events due to inadequate procedures; and (3) the details of your operations performance plan, including expected completion dates.

The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/s/ J. L. Caldwell
James L. Caldwell, Director
Division of Reactor Projects

Docket Nos. 50-295; 50-304

License Nos. DPR-39; DPR-48

Enclosures: 1) Notice of Violation
2) Inspection Report
No. 50-295;304/96-14(DRP)

PLEASE SEE ATTACHED CONCURRENCES

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James L. Caldwell, Director
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