

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 October 12 through December 6, 1996, five 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. Technical Specification 6.2.1.a requires that written procedures be prepared, implemented, and maintained for procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, specifies equipment control, e.g., locking and tagging, as an example of an administrative procedure.

Zion Administrative Procedure (ZAP) 300-06, "Out-of-Service Process," Revision 9, Section E.6 requires, in part, that once an out-of-service (OOS) is in place, physical operation of an OOS component is prohibited.

Contrary to the above, on November 2, 1996, residual heat removal system heat exchanger "A" discharge to letdown heat exchanger valve 2RH-8734A, which was an OOS component, was operated.

This is a Severity Level IV Violation (Supplement I).
(50-304/96017-01)

2. Technical Specification 3.15.2.C requires that when one of the three emergency diesel generators (EDGs) for a unit is rendered inoperable, the two remaining EDGs be demonstrated operable within 24 hours and that the availability of two sources of off-site power be demonstrated within one hour and at least once per every eight hours thereafter.

Contrary to the above, on October 26, 1996, the "0" EDG (common to both units) was rendered inoperable when the Unit 2 diesel control switch was placed in the pull-to-lock position, and the licensee did not demonstrate that the remaining two Unit 1 EDGs were operable within 24 hours of this date, and failed to demonstrate the availability of two sources of off-site power within one hour of rendering the "0" EDG inoperable and every eight hours thereafter.

This is a Severity Level IV Violation (Supplement I).
(50-295/96017-03; 50-304/96017-03)

3. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Actions," requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected, and in the case of significant conditions adverse to quality, that measures be established to assure that the cause of the condition is determined and corrective action taken to preclude recurrence.

Contrary to the above, from September 12 through November 8, 1996, insufficient monitoring of the 011 125 Volt-D.C. battery exhaust ventilation system, a condition adverse to quality, was not corrected. Problem Identification Form 2402, was closed without the identified corrective actions being completed or being tracked by another mechanism to ensure their completion.

This is a Severity Level IV violation (Supplement I)
(50-295/96017-04; 50-304/96017-04)

4. 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 be accomplished in accordance with these instructions, procedures, or drawings.

Zion Operability Determination Manual (ZODM) 0, "Operability Determination Program," Revision 8, requires:

- In Section 5.1.B, that a system, subsystem, train, component, or device that fails to meet acceptance criteria specified in governing and approved procedures, be considered inoperable.
- In Section 5.1.E, that Appendix A, "Initial Operability Assessment," be completed for a potential operability issue within 24 hours of identifying the issue.
- In Section 5.3.A, that engineering personnel assess all potential operability issues by completing Appendix B, "Operability Issue Form," and that this assessment be completed within a time period commensurate with the affected component's safety significance, and in all cases, within five days of the initial discovery of the operability issue.

Electrical Maintenance Surveillance Procedure (EMSP) 01, "Station Battery Monthly and Quarterly Surveillance," Revision 1, Step 3.14, requires that average cell voltage be calculated and recorded.

Zion Administrative Procedure (ZAP) 900-06, "Compressed Gas Cylinder Controls," Revision 1, Step 3.a, requires, in part, that all compressed gas cylinders be properly secured.

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

- a. On April 1, October 7 and 26, and November 4, 1996, when specific gravity measurements for the 011 125 Volt-D.C. station battery, conducted in accordance with EMSP-01, did not meet test acceptance criteria, neither the battery or affected individual cells were declared inoperable in accordance with ZODM-0, Section 5.1.B.
- b. On July 1, 1996, average cell voltage was not correctly calculated and recorded in accordance with EMSP-01, Step 3.14, on the 011 125 Volt-D.C. station battery.
- c. On November 6, 1996, compressed gas cylinders were not properly secured in accordance with ZAP 900-06, Step 3.a, when maintenance personnel attached a gas cylinder to a seismic scaffold which invalidated the seismic evaluation of the scaffold.
- d. Appendix B, "Operability Issue Form," of ZODM-0, was not completed until November 8, 1996, for missing jacket water piping supports on the "1A" and "0" EDGs which were identified on October 25, 1996.
- e. Appendix A, "Initial Operability Assessment," and Appendix B, "Operability Issue Form," of ZODM-0 were not completed until November 14 and 15, 1996, respectively, for a partially disassembled service water piping support which was identified on November 7, 1996.
- f. Appendix A, "Initial Operability Assessment," of ZODM-0 was not completed until November 26, 1996, for a missing pipe support for high pressure N₂ backup pressure control valve IPCV-NT10, which was identified on October 16, 1996.

This is a Severity Level IV violation (Supplement I)
(50-295/96017-06; 50-304/96017-06)

- 5. 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 be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, instructions were not appropriate to the circumstances in the following instances:

- a. On October 15, 1996, Work Request No. 950117181-01, "Clean, Inspect, Test & Prep New Generator & Exciter for Installation," did not provide appropriate guidance to control the configuration of the 2A EDG neutral ground lead. Consequently, the lead was not reconnected before operating the 2A EDG, preventing a single phase ground from being detected if one had occurred.

- b. On November 4, 1996, Work Request No. 940029891-01, "Replacement of the 2A Governor with a Woodward Reverse Acting 2301A Field Change," did not provide appropriate guidance to control the alignment of the 2A EDG governor actuator. As a result, the governor actuator was misaligned, and during the next EDG start, excessive fuel was supplied to the engine causing the EDG to trip on overspeed.
- c. On November 28, 1996, Work Request No. 960110430-01, Revision 1, for replacement of the 1A auxiliary feedwater pump turbine inboard bearing, did not provide guidance on the installation of oil slinger rings. Consequently, during post-maintenance testing, the bearing was damaged due to inadequate lubrication.

This is a Severity Level IV violation (Supplement I)
(50-295/96017-08; 50-304/96017-08)

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company 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 this 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in the Notice, an order or a Demand for Information may be issued as to 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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of privacy or provide the information

required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois
this 3rd day of February 1997