

NOTICE OF VIOLATION

Commonwealth Edison Company
Zion Station, Units 1 and 2

Docket Nos. 50-295; 50-304
Licenses No. DPR-39; DPR-38

During an NRC inspection conducted from September 23 - October 24, 1996, 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. Zion 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 ZAP 620-7, "Proper Operation and Response To Contamination Monitors," Revision 1, requires, in part, that radiation protection personnel shall be notified immediately after contamination has been detected as indicated by a single alarm on any radiation detection device and that removing and quantifying contamination shall only be performed by a qualified radiation protection technician.

Contrary to the above, on June 10, 1996, an individual, who was not a qualified radiation protection technician, alarmed a radiation detection device, failed to notify radiation protection personnel, and removed the contamination.

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

2. Technical Specification 3.13.3.C. requires that the radiation monitors which isolate the containment vent and purge system be operable during core alterations.

Contrary to the above, on September 24, 1995, radiation monitors which isolate containment vent and purge system were inoperable during core alterations.

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

3. Technical Specification 3.14 requires that radiation monitoring equipment shown in Table 3.14-1 be operable and, with one or more of the channels inoperable, that the action shown in Table 3.14-1 be implemented.

Action 26 of Table 3.14-1 requires that a grab sample analysis be performed at least once per shift when radiation monitor OR-PR07 has less than 1 operable channel.

Contrary to the above, on July 5, 1996, grab samples were not obtained and analyzed once per shift when monitor OR-PR07 was inoperable.

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

4. Technical Specification 6.2.6.A requires, in part, that a program to control radioactive effluents which conforms to 10 CFR 50.36(a) and is contained in the Offsite Dose Calculation Manual (ODCM) shall be implemented and maintained.

ODCM 12.2.2 requires that radioactive gaseous effluent monitor equipment shown in Table 12.2-3 be operable and, with one or more of the channels inoperable, that the action shown in Table 12.2-3 be implemented.

Action 6 of Table 12.2-3 requires, in part, that grab samples be obtained at least once per shift and analyzed for gross activity within 24 hours when radiation monitor 1R-0015 or radiation monitor 2R-PR25 have less than 1 operable channel.

Contrary to the above, the licensee failed to obtain required samples at least once per shift and analyze for gross activity as evidenced by the following examples:

- a. On July 26, 1996, grab samples were not obtained and analyzed as required, when monitor 1R-0015 was inoperable.
- b. On September 22-25, 1996, grab samples were not obtained and analyzed as required, when monitor 2R-PR25 was inoperable.

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

With respect to Item 1, the inspection showed that actions had been taken to correct the identified violation and to prevent recurrence. Consequently, no reply to the violation is required and we have no further questions regarding this matter. With respect to Items 2, 3, and 4, 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.

Dated at Lisle, Illinois
this 21st day of November 1996