

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos. 50-295/85029(DRS); 50-304/85030(DRS)

Docket Nos. 50-295; 50-304

License Nos. DPR-39; DPR-48

Licensee: Commonwealth Edison Company  
P. O. Box 767  
Chicago, Illinois 60690

Facility Name: Zion Nuclear Power Station, Units 1 & 2

Inspection At: Zion, Illinois

Inspection Conducted: August 19, 21, 22, 1985

Inspector: *N. C. Choules*  
N. C. Choules

9-3-85  
Date

Approved By: *F. C. Hawkins*  
F. C. Hawkins, Chief  
Quality Assurance Programs Section

9-3-85  
Date

Inspection Summary

Inspection on August 19, 21, 22, 1985 (Report Nos. 50-295/85029(DRS);  
50-304/85030(DRS))

Areas Inspected: Licensee actions on previous inspection findings. The  
inspection involved 24 inspector-hours onsite by one NRC inspector.

Results: Of 12 previous inspection findings, 10 were closed.

8509090045 850903  
PDR ADOCK 05000295  
G PDR

## DETAILS

### 1. Persons Contacted

#### Commonwealth Edison Company

- \*K. Graesser, Station Manager
- \*G. Pliml, Superintendent Production
- \*W. Kurth, Assistant Superintendent
- \*R. Cascarano, Technical Staff Supervisor
- \*C. Shultz, Assistant Technical Staff Supervisor
- \*J. Winston, Quality Control
- \*J. Rappeport, QA Engineer
- R. Budowle, Operating Engineer
- A. Ockert, Assistant Technical Staff Supervisor
- M. Carnahan, Training Supervisor
- D. Kaley, Procedure Coordinator
- E. Slobodianuk, Engineering Assistant
- W. Sopata, Shift Foreman
- R. Johnson, Master Mechanic
- A. Amoroso, Technical Staff

#### U.S. Nuclear Regulatory Commission

- \*M. Holzmer, Senior Resident Inspector
- \*L. Kanter, Resident Inspector

Other personnel were contacted as a matter of routine during the inspection.

\*Indicates those attending the exit meeting on August 22, 1985.

### 2. Licensee Action on Previous Inspection Findings

- a. (Open) Open Item (295/84-21-01; 304/84-22-01): Control personnel lack training on marked up drawing file. Interviews indicated that some control room personnel had been trained on the drawing file but others had not. The person involved with this training was not available during the inspection, and the details of the training performed could not be determined at this time. To ensure that training on the drawing file is completed in the future, the licensee will add this training to the licensed operator training program. The item will remain open pending further review.
- b. (Closed) Open Item (295/84-21-02; 304/84-22-02): The jumper and lifted lead procedure did not address the need to provide the basis that an unreviewed safety question was not involved in safety evaluations for jumpers and lifted leads. The procedure for the control of jumpers and lifted leads, ZAP 3-51-4, has been revised to address this concern.

- c. (Closed) Unresolved Item (295/84-21-04; 304/84-22-04): Inadequacies in the tagging procedure. The licensee had revised the tagging procedure, ZAP 14-51-2, to better describe the tagging process and provide improved controls over it. The inspector reviewed a QA audit of tagging activities. Some minor documentation problems were identified, but there were no problems attributable to the tagging procedure.
- d. (Closed) Open Item (295/84-21-05; 304/84-22-05): Independent verification activities were performed by individuals functioning together rather than independently. The licensee has revised applicable procedures to require verifications to be performed independently such that the verifications are done "apart in time". Interviews indicated that the verifications were being performed as required.
- e. (Open) Open Item (295/84-21-06; 304/84-22-06): Periodic surveillance testing procedures did not list the items to be verified, such as valve and breaker positions. The licensee is revising these procedures to specify the items to be verified. The revisions are expected to be completed by October 1, 1985. This item will remain open pending completion of the revisions.
- f. (Closed) Open Item (295/84-21-07; 304/84-22-07): Instrument and Control (I&C) procedures did not require documentation of independent verification activities. The licensee had issued procedure Nos. IMEP 2, 3, and 5 which require documentation of independent verification and are used as generic supplements to the normal I&C procedures. These procedures are being used until the I&C procedures are revised to require the appropriate documentation. At the time of this inspection, approximately 80% of the I&C procedures for the reactor protection system had been revised. Based on the use of the interim verification procedures and the licensee's progress on revising procedures, the inspector has no further questions and this item is considered closed.
- g. (Closed) Open Item (295/84-21-09; 304/84-22-09): Weaknesses in the work request (WR) procedure and WR form. The licensee had revised both the WR procedure (ZAP 3-51-1) and the WR form to include the correction of identified weaknesses.
- h. (Closed) Open Item (295/84-21-10; 304/84-22-10): Development of vendor manual control procedure. The licensee had completed the preparation of the vendor manual control procedure. Implementation of the procedure was in progress.
- i. (Closed) Unresolved Item (295/84-21-11; 304/84-22-11): Licensee's procedure did not include instructions to ensure that only qualified personnel are used to perform special processes. The inspector reviewed six work requests in which a special process (welding) was performed. A review of the welders' qualifications indicated that they were qualified to perform the welding. Interviews revealed

that maintenance foremen were aware that special processes are required to be performed by qualified personnel, even though it is not specifically stated in a procedure. To emphasize this requirement, the licensee agreed to revise the work request procedure ZAP 3-51-1 to require foremen to ensure that qualified personnel are used to perform special processes. The inspector has no further questions, and this item is considered closed.

- j. (Closed) Open Item (295/84-21-12; 304/84-22-12): No procedure existed for the control of Technical Specification changes which affect surveillance test requirements. The licensee has written and approved Technical Staff Licensing Administrator Desk Procedure 003 (Technical Specification amendments). This procedure defines the procedure for receipt, review and distribution of Technical Specification amendments, and it includes instructions to ensure that amendments and procedures are reviewed to identify new or changed surveillance requirements.
- k. (Closed) Unresolved Item (295/84-21-13; 304/84-22-13): Some Technical Staff Surveillance (TSS) procedures did not clearly identify who performed, reviewed, and approved the completed surveillance test results. The licensee had revised eleven procedures to more clearly specify the appropriate requirements. The inspector has no further questions regarding this item.
- l. (Closed) Violation (304/84-22-14): Failure to approve changes to TSS Procedure 15.6.35.2. The inspector verified through interviews and review of TSS procedure 15.6.35.2, that the corrective action stated in the licensee's letter dated December 28, 1984, had been completed. Corrective action included revision of the procedure and instructing the Technical Staff Engineers on the importance of using the proper change procedure.

### 3. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) on August 22, 1985, and summarized the purpose, scope, and findings of the inspection. The inspector discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any such documents or processes as proprietary.