



November 25, 1996

U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Commonwealth Edison (ComEd) Response to Notice of Violation;
Zion Nuclear Power Station Units 1 and 2;
NRC Inspection Report 50-295/304-96010
NRC Docket Numbers 50-295 and 50-304

Reference: 1. J. L. Caldwell letter to J. H. Mueller dated October 22, 1996 (NRC
Inspection Report 50-295/304-96010)

2. J.H. Mueller letter to USNRC dated September 27, 1996 (Response to
NRC Inspection Report 50-295/304-96007)

Attached is the ComEd response to the Notice of Violation (NOV) transmitted by the Reference 1 letter and discussed in the subject inspection report. The NOV cited four severity level IV violations, with one violation containing two examples. One of the violations concerned the second occurrence of overflowing the OB lake discharge tank, which ComEd responded to in the Reference 2 letter. Therefore, this violation will not be addressed in the attachment to this letter as noted in Reference 1. Also, an extension to November 25, 1996, for this response was obtained in a phone call between Mr. Dapas of Region III and Mr. Farrar of the Zion Staff.

The violations discussed in the subject inspection report indicate concerns with the adequacy of procedures, procedure adherence, and timely and effective corrective actions. We agree with your conclusion that improvements are needed in these areas, and we are committed to taking action to correct them.

Strategy Three of the Zion Operations Performance Improvement Plan: "Plant Procedures" addresses the issue of procedure adequacy and adherence. In this Action Plan, we will improve the ability of the workers to use plant procedures by improving the quality of our procedures, and we will improve our adherence to them.

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To address the issue of timely corrective actions, a Zion Corrective Action Improvement Plan has also been established. Strategy 1 of this Plan is designed to strengthen department head ownership of the corrective actions process. The process is being streamlined to ensure timely review of significant events and timely implementation of corrective actions. Problem Identification Forms (PIFs) are now reviewed daily by senior management and significant events are assigned for evaluation and prompt correction by line management.

Corrective actions to address the specific violations are discussed in the attachment to this letter.

If you have any questions or require additional information, please contact Mr. Dennis Farrar, Regulatory Assurance Manager, at (847) 746-2084, extension 3353.

Sincerely,



J. H. Mueller
Site Vice President
Zion Station

Attachment A: Summary of Commitments

Attachment B: Response to the Notice of Violations

cc: A. Bill Beach, Regional Administrator, Region III
C. Y. Shiraki, Zion Project Manager, NRR
Acting Senior Resident Inspector, Zion Station
Office of Nuclear Facility Safety - IDNS

ATTACHMENT A

Summary of Commitments identified in this Violation Response:

- 1) Actions required in Technical Specifications for inoperable radiation monitors have been reviewed to verify that the procedural action requirements in ZRP 5820-12 are in agreement with those listed in the Technical Specifications. As a result of this review, minor discrepancies were found in ZRP 5820-12. The necessary procedure changes to ZRP 5820-12 required to correct these discrepancies will be completed by November 27, 1996.
- 2) Based on lessons learned from this event, all fuel handling surveillances and instructions were reviewed. One involving receipt of new control rods was determined to be deficient and will be revised by December 31, 1996 prior to use.
- 3) Three fuel handling instructions were identified as ones which could be enhanced. These enhancements will be complete by January 10, 1997.

ATTACHMENT B

Notice of Violation Response

VIOLATION: 50-295/304-96010-03, 50-295/304-96010-09

During an NRC inspection conducted on July 13 through August 29, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

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.

Procedure ZRP 5820-12, "Out of Service Surveillance for Radiation Monitors," Revision 4, requires implementation of Technical Specification action statements for inoperable radiation monitors.

Technical Specification, Table 3.14, "Radiation, Monitoring Instrumentation," requires that with radiation monitor 2R-ARO3 inoperable, an alternate method of monitoring containment be initiated within 72 hours.

Procedure, FHI-02, "Handling of Shipping Containers and Site Removal of New Fuel Assemblies From Shipping Containers and Inspection of New Fuel," Revision 2, Step 9, requires that the fuel handling crew slowly lift one end of the shipping container for new fuel assemblies being moved with the overhead crane using a minimum rated two ton nylon sling, until the lateral lock tubes slide into their support housing.

Contrary to the above,

- a. On July 26, 1996, ZRP 5820-12 was not appropriate to the circumstances, in that it stated that an alternate method of monitoring containment within 72 hours with radiation monitor 2R-ARO3 inoperable was not required, when an alternate method was required by TS Table 3.14.
- b. On July 30, 1996, FHI-02, Step 9, was not appropriate to the circumstances, in that it did not specify how to properly rig the shipping container for the lift. Consequently, personnel inadvertently dropped a shipping container with two new fuel assemblies, during new fuel assembly receipt inspection.

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

ATTACHMENT B

Notice of Violation Response

REASONS FOR THE VIOLATION

ComEd acknowledges the violation. The reason for the violation was inadequate procedures and practices concerning LCO management.

- a. Technical Specifications, Table 3.14 requires that an alternate method of monitoring containment be established within 72 hours of radiation monitor 2R-ARO3 becoming inoperable. However, due to inadequate review and oversight, Procedure ZRP 5820-12 "Out-of-Service Surveillance for Radiation Monitor" incorrectly specified that no action was required.
- b. The Fuel handlers rigged the assemblies based on past experience due to the absence of adequate procedural guidance. Procedure FHI-02, "Handling of Shipping Containers and Site Removal of New Fuel Assemblies from Shipping Containers and Inspection of New Fuel", did not provide guidance relative to attaching shackles for positive engagement of the sling.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

- a. Procedure ZRP 5820-12 has been revised to include the required action that an alternate method of monitoring the appropriate parameters be established within 72 hours of a containment range area monitor becoming inoperable. This revision also lists the alternative methods which may be used in preferential order.

The Operations performance plan includes actions to heighten Operations Standards towards their control of Technical Specification actions regarding Limiting Condition for Operations (LCO). Implementation of the plan results in the Operations Department taking clear control and ownership of the LCO management process.

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- b. The effected fuel assemblies were inspected and no visible damage was noted. Accelerometers were checked and none were found in the tripped condition. Westinghouse was contacted and it was verified that there were no adverse effects to the fuel.

Subsequently, FHI-02 was revised to require fuel handlers to attach the sling to the pillow blocks on the bottom of the support frame with rated shackles or hooks. To further reinforce knowledge of this event, the circumstances surrounding it were discussed with the Fuel Handling Department in a tailgate session.

Additionally, this event was discussed during a "Station Safety Stand-Down" held on August 1 and 2, 1996. At this time, station management re-emphasized the expectation that all work should be completed; safely, per procedure, and if a governing procedure is found to be inadequate the work should be immediately suspended until the procedural inadequacy is corrected.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Actions required in Technical Specifications for inoperable radiation monitors have been reviewed to verify that the procedural action requirements in ZRP 5820-12 are in agreement with those listed in the Technical Specifications. As a result of this review, minor discrepancies were found in ZRP 5820-12. The necessary procedure changes to ZRP 5820-12 required to correct these discrepancies will be completed by November 27, 1996.

Based on lessons learned from this event, all fuel handling surveillances and instructions were reviewed. One involving receipt of new control rods was determined to be deficient and will be revised by December 31, 1996 prior to use.

Three other fuel handling instructions were identified as ones which could be enhanced. These enhancements will be complete by January 10, 1997.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance

ATTACHMENT B

Notice of Violation Response

VIOLATION: 50-295-96010-05

During an NRC inspection conducted on July 13 through August 29, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," states that measures shall be established to assure 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, inadequate corrective actions were taken after the licensee identified a scaffold interference with the Unit 1 turbine stop valves on June 17, 1996. As a result, on August 5, 1996, the inspectors identified that a scaffold around the 1B containment spray pump obstructed operation of the 1B containment spray discharge valve.

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

REASONS FOR THE VIOLATION

ComEd acknowledges the violation. The reason for the violation was untimely implementation of corrective actions. The corrective actions identified for the June 17, 1996 scaffold problem included walk downs of existing scaffolding and the revision of procedure ZAP 920-01 "Use of scaffolding and Ladders" to clearly delineate accountability for erecting scaffolding and to clarify the requirement that Operations inspect installed scaffolding for operational interference. These corrective actions had not been fully implemented prior to the August 5, 1996 event.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

As a result of the August 5, 1996 event, all scaffolding work was stopped while scaffolds were inspected and procedure changes were made and put in place before work resumed.

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To further reinforce the knowledge of contractors responsible for scaffold construction, management reiterated the expectation that scaffolding be erected such that it in no way interferes with plant equipment. To improve worker awareness, the mechanical contractor added guidance regarding building scaffolding without impacting the operation of plant equipment to the carpenters' training.

Maintenance Engineering revised ZAP 920-01 "Use of scaffolding and Ladders" to clearly delineate accountability for erecting scaffolding and to require that an Operations representative inspect installed scaffolding for any operational interference.

To address the issue of timely corrective actions, a corrective action improvement plan has been established. Strategy 1 of the plan is to strengthen department head ownership in the corrective actions process. As a result, this process is being streamlined to ensure timely review of significant events and timely implementation of corrective actions. All Problem Identification Forms (PIFs) are now reviewed daily by senior management and those involving significant events are assigned for evaluation and correction by line management.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance

ATTACHMENT B

Notice of Violation Response

VIOLATION: 50-295/304-9/010-06

During an NRC inspection conducted on July 13 through August 29, 1996, a violations of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion XVII, "Quality Assurance Records," requires in part that sufficient records shall be maintained to furnish evidence of activities affecting quality and that the records shall record the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted.

Contrary to the above, on August 16, inspectors identified that a missing part and an inadequately secured part had not been documented in the as-found condition portion of the work package for the 1B CCP shaft driven oil pump.

REASONS FOR THE VIOLATION

ComEd acknowledges the violation. The reason for the violation was failure to follow procedures. The mechanic was aware of the missing plate on the 1B charging pump, but failed to accurately and completely document the as-found condition of the component as required by procedure.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

The Mechanical Maintenance Supervisor counseled the mechanic and he now understands the expectation that as-found conditions be recorded accurately and in appropriate detail and that maintenance history documentation be maintained.

The 1B Charging pump shaft driven lube oil pump (1VC007) missing cover plate was identified when the pump experienced degraded flow and caused the 1B charging pump auxiliary lube oil pump to cycle on and off. Immediate actions were taken to ensure that this problem did not exist on similar Emergency Core Cooling Pumps:

- 1) The maintenance history was reviewed for the 1A Charging pump shaft driven lube oil pump (1VC006), previously disassembled and reassembled in July 1995. The pressure of the pump was found within the design required limits by the system engineer.

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- 2) The maintenance history was reviewed for the 2A/2B Charging pump shaft driven lube oil pumps (2VC006/2VC007), and no previous disassembly and reassembly tasks were found.
- 3) The maintenance history was reviewed for the AFW and SI pump shaft driven lube oil pumps. These shaft driven lube oil pumps do not have a gear pump cover retaining plate.

To further emphasize the significance of this event, the Mechanical Maintenance Department included lessons learned from this event in Pre-job briefs. Mechanics and Mechanical Maintenance Supervisors received briefing on the expectation that they ensure the accuracy and completeness of work package documentation.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Zion Station is currently in full compliance.