

## 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 February 6 through April 2, 1997, four 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. 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," requires that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above, on February 21, 1997, inspectors identified that periodic test PT-6C-ST-RT, "Containment Spray C Pump System Tests and Checks," Revision 8, was inadequate to demonstrate that the containment spray system will perform satisfactorily in service; in that, both battery starting circuits for the "C" containment spray pumps were not tested to ensure that the design starting time requirement was met.

This is a Severity Level IV violation (Supplement I).  
(50-295/97002-06, 50-304/97002-06)

2. 10 CFR Part 50, Appendix B, Criteria 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 actions taken to preclude recurrence.

Contrary to the above,

- a. From January 19, 1994, through February 21, 1997, the licensee failed to implement effective corrective actions for NRC Violation 50-295/93023-01, 50-304/93023-01, dated January 19, 1994; in that, periodic tests PT-6C-ST, "Containment Spray C Pump System Tests and Checks," Revision 5, and PT-6C-ST-RT, "Containment Spray C Pump System Tests and Checks," Revision 8, which did not contain any requirements or acceptance criteria to evaluate the acceptability of starting time delays, were not corrected.
- b. From February 26, 1995, through February 11, 1997, the licensee did not determine the cause and implement effective corrective actions to preclude recurrence for the cracked lube oil cooler channel head on the 2B emergency diesel generator (EDG), a significant condition adverse to quality. A subsequent failure associated with the 2A EDG on February 11, 1997, was due to the same cause, over-torquing of a cast iron raised face flange.

This is a Severity Level IV violation (Supplement I).  
(50-295/97002-07, 50-304/97002-07)

3. 10 CFR Part 50, Appendix B, Criteria V, "Instructions, Procedures, and Drawings," requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstance and be accomplished in accordance with these instructions, procedures, or drawings.

Zion Operability Determination Manual (ZODM) 0, "Operability Determination Program," Revision 9, requires that all potential operability issues be assessed by engineering by completing Appendix B, "Operability Issue Form." Further, it requires that the time allowed for completion of Appendix B is to be consistent with the safety significance of the affected component. However, in all cases it shall be within 5 days from the initial discovery of the degradation or deficiency.

Contrary to the above, the licensee did not complete Appendix B, "Operability Issue Form," of ZODM-0 until March 25, 1997, for the 1C containment spray pump starting time delay which was identified on February 12, 1997.

This is a Severity Level IV violation (Supplement I).  
(50-295/97002-08)

4. Technical Specification 6.2.2.B, requires areas accessible to personnel with radiation levels greater than 1000 mrem/hr at 30 cm (12 inches) from the radiation source or from any surface which the radiation penetrates shall have locked doors to prevent unauthorized entry.

Zion Administrative Procedure 610-02, "High Radiation Area Access Control," Revision 3, requires that entrances to accessible high radiation areas with radiation levels greater than 1000 mrem/hr be locked or be controlled by a key custodian who has direct oversight of and positive control over each personnel entry into the area.

Contrary to the above, on April 1, 1997, the entrance to the Unit 1 vertical pipe chase, a high radiation area with a radiation dose of approximately 1,500 mrem/hr, was not locked nor controlled by a key custodian who had direct oversight of and positive control over each personnel entry into the area. As a result, an unauthorized individual was allowed to enter the high radiation area without proper oversight and control.

This is a Severity Level IV violation (Supplement IV).  
(50-295/97002-10)

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 4th day of June 1997