



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

July 12, 1979

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Zion Station Units 1 and 2
Revision to Proposed Amendment to
Facility Operating Licenses DPR-39 and
DPR-48
NRC Docket Nos. 50-295 and 50-304

References (a): March 9, 1977 letter from R. L. Bolger
to B. C. Rusche

(b): April 4, 1977 letter from R. L. Bolger
to A. Schwencer

Dear Mr. Denton:

Per Reference (a), Commonwealth Edison Company requested license amendment to the Zion Station Technical Specifications to delete the sensitivity requirements for radiation monitors measuring noble gases primarily to avoid noncompliance with a monitor sensitivity that was impractical and technically unfeasible. Reference (b) provided additional bases for the request in Reference (a).

Subsequent discussions with the NRC Staff have indicated that deletion of the sensitivity requirements was not acceptable because of impending Appendix I Technical Specification requirements. As a result, Commonwealth Edison has reevaluated the proposed change of Reference (a) and has revised the units of the sensitivity limits to be compatible with the monitor readout. Attachment 1 contains the revised technical specification change. The basis for this change follows.

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Mr. Harold R. Denton:

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Currently, sensitivity requirements for radiation monitors as defined by Zion Technical Specification 4.12.1.B.2 are in units of uCi/sec. The Zion release point radiation monitors have outputs calibrated in uCi/cc. Since these monitors are independent of the flow rate of the release path which they are monitoring, their outputs can only be expressed in activity. Thus, the revised change of Attachment 1 will more accurately reflect the existing plant monitoring release rate. In addition, the sensitivity limits defined herein are consistent with the intent of 10 CFR 50 Appendix I and will not result in any reductions in the margin of safety.

The revised change of Attachment 1 has been reviewed by On-Site and Off-Site Review with the conclusion that no unreviewed safety questions exist.

Three (3) signed originals and thirty-seven (37) copies of this letter and attachment are provided for your use.

Very truly yours,

C. Reed

Cordell Reed
Assistant Vice-President

attachment

SUBSCRIBED and SWORN to
before me this 12th, day
of July, 1979.

Nancy M. Roscigno
Notary Public