



Commonwealth Edison

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

March 4, 1980

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

Subject: Zion Station Units 1 and 2
Request for Advance Approval for
NDE Exemptions to Inservice
Inspection (ISI) Program
NRC Docket Nos. 50-295 and 50-304

References (a): June 28, 1979 letter from W. F. Naughton
to H. R. Denton containing revised ISI
Program for Zion Station

(b): October 1, 1979 letter from D. L. Peoples
to H. R. Denton

(c): October 26, 1979 letter from A. Schwencer
to D. L. Peoples

Dear Mr. Denton:

Commonwealth Edison Company requests the Nuclear
Regulatory Commission (NRC) Staff for advance approval for Zion
Station of the non-destructive examination (NDE) exemptions
requested in Reference (a), which contains the revised
Inservice Inspection (ISI) Program for Zion Station. Approval
is needed by April 30, 1980. The basis for this request
follows.

In Reference (c), Commonwealth Edison requested the
above advance approval for Zion Unit 1, which was granted by
the NRC Staff in Reference (c). However upon review of
Reference (c), Commonwealth Edison found that relief from
performing volumetric examinations on pressure retaining
bolting was not granted. These items, identified as Notes 20
and 21 in the Zion Class 1 Component Examination Table, were
included in the advance relief request of Reference (b).

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Commonwealth Edison

Mr. Harold R. Denton, Director
March 4, 1980
Page 2

Based on a mid-October conference call with the Staff Commonwealth Edison anticipated receiving this relief and thus, volumetric examinations of the reactor vessel closure studs and nuts were not performed during the Fall 1979 refueling outage of Unit 1. Surface examinations were performed as an alternative in keeping with the relief request. Currently for Zion Unit 1 the completion date for the second 40-month period of the 10-year interval is August 31, 1980. Since the volumetric examinations cannot be accomplished unless the studs are removed and since the next scheduled refueling outage is for Spring 1981, advance relief for this item is required to avoid possible Technical Specification noncompliance. Therefore, Commonwealth Edison re-requests advance relief for this item.

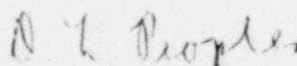
In addition, due to the recent extended Unit 2 feedwater nozzle repair outage, the forthcoming Spring 1980 refueling outage will be the last occasion for performing the ISI examinations in the second 40-month period which ends June 19, 1981. Thus, Commonwealth Edison also requests advance approval for Zion Unit 2 of the items requested and granted for Zion Unit 1 in References (b) and (c). Also, Commonwealth Edison requests advance approval for both Zion units from performing the volumetric examinations on pressure retaining bolts as indicated above.

In order to properly plan the upcoming Unit 2 refueling outage activities, Commonwealth Edison requests the NRC Staff to expedite and approve this submittal by April 30, 1980.

Please address any questions that you might have concerning this matter to this office.

One (1) signed original and thirty-nine (39) copies of this letter are provided for your use.

Very truly yours,


D. Louis Peoples
Director of
Nuclear Licensing

DLP:WFN:rap

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