

ISHAM, LINCOLN & BEALE
COUNSELORS AT LAW

ONE FIRST NATIONAL PLAZA FORTY-SECOND FLOOR
CHICAGO, ILLINOIS 60603

TELEPHONE 312-558-7500 TELEX: 2-5288

WASHINGTON OFFICE
1120 CONNECTICUT AVENUE, N.W.
SUITE 325
WASHINGTON, D. C. 20036
202-833-9730

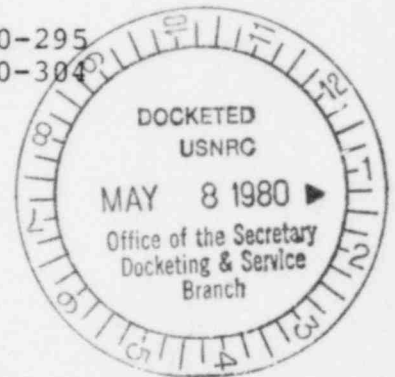
May 5, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

IN THE MATTER OF)
)
COMMONWEALTH EDISON COMPANY)
)
(Zion Station Units 1 and 2))
)
Proposed Amendments to)
Increase Spent Fuel Storage)
Capacity (43 F.R. 30938))

Docket Nos. 50-295
50-304



Dear Board Members;

Enclosed are two affidavits from Commonwealth Edison employees describing minor changes which Commonwealth Edison desires to make in the procedures previously described for carrying out the spent fuel rack replacement job at Zion Station.

Tom Tramm's affidavit explains that Commonwealth Edison intends to cut two small pieces from one of the old Zion racks for research purposes. This conflicts with the affidavit of John P. Leider, Jr., dated January 9, 1979, which stated in response to Intervenor's contention 14 (subsequently renumbered 2(n)) dealing with occupational exposure that the old racks would not be cut up prior to shipment off-site to a licensed burial facility. The Licensing Board granted summary disposition in respect of this issue on May 1, 1979.

The second change is that Commonwealth Edison now wishes to substitute annual dye-penetrant and visual testing of the intergranular stress corrosion cracking specimens for

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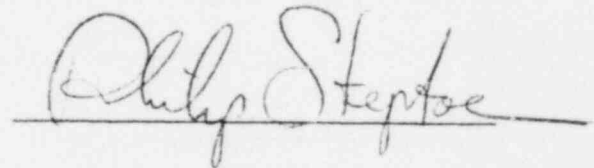
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the annual ultrasonic and visual testing originally committed to by Commonwealth Edison and reflected in the Licensing Board's Initial Decision dated February 14, 1980 at page 62, footnote 166. The reasons for the proposed change and why it is an improvement are given in the enclosed affidavit of Robert Shannon. For reasons of logistical convenience, Commonwealth Edison did not attempt to secure a similar affidavit from Dr. Roger Staehle of the University of Minnesota, who previously submitted affidavits as Commonwealth Edison's expert on intergranular stress corrosion cracking in this proceeding. However, I understand that Dr. Staehle has been consulted and has no objection to the proposed change.

These changes have previously been communicated orally to the NRC Staff and Intervenor. They are being brought to the attention of both the Appeal Board and the Licensing Board in compliance with the duty of full disclosure as circulated by the Appeal Board in Duke Power Company (William B. McGuire Station, Units 1 and 2) ALAB-143, 6 AEC 623, 625-26 (1973). In particular, although both changes are considered minor, the fact that Licensee is making such changes has some relevance to Intervenor's argument on appeal that certain licensee commitments, including corrosion surveillance, should be formalized as amendments to the Zion operating licenses or as technical specifications.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Philip Steptoe", is written over a horizontal line.