



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767
Chicago, Illinois 60690

May 23, 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
Proposed Change to Facility
Operating License Nos. DPR-39
and DPR-48
NRC Docket Nos. 50-295 and 50-304

Reference (a): April 10, 1980 letter from D. G. Eisenhut to All
Power Reactor Licensees

Dear Mr. Denton:

In accordance with Reference (a) and pursuant to 10 CFR 50.59, Commonwealth Edison Company hereby requests a change to Facility Operating License Nos. DPR-39 and DPR-48, Appendix A, Technical Specifications. The purpose of this amendment is to define the term "OPERABLE" to be consistent with the definition used in the PWR Standard Technical Specifications to assure that no set of equipment outages would be allowed to persist that could result in the facility being in an unprotected condition. The proposed changes to the Zion Station Technical Specifications are included in Attachment 1 to this letter. Additional information concerning these changes follows.

Through a conference call with Mr. Virgilio of your Staff, Commonwealth Edison clarified that instrument buses and DC power supplies were not intended to be included in the technical specification changes requested by Reference (a).

Reference (a) also requested Commonwealth Edison to specify a unit shutdown if a Limiting Condition for Operation (LCO) cannot be met. This has been added as Specification 3.0.1. The proposed change of Attachment 1 utilizes four (4) hours to achieve hot shutdown and an additional 48 hours to achieve cold shutdown. These times were chosen to maintain consistency with the times specified in the current Zion Station Technical Specifications. In addition, Attachment 1 contains specific exceptions to Specification 3.0.1.

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Using the exceptions delineated in the Standard Technical Specifications as guidance, these exceptions are as follows:

<u>Specification</u>	<u>Title</u>
3.10	Containment Structural Integrity
3.11	Radioactive Liquids
3.12	Radioactive Gases
3.13	Refueling Operations
3.14	Plant Radiation Monitoring
3.16	Environmental Radiological Monitoring Program
3.17.2	Aircraft Fire Detection
3.19	Failed Fuel Monitoring
3.21	Fire Protection

Finally, two additional minor clarifying changes have also been included in Attachment 1 since they happen to be on the pages under revision. First, under Specification 4.13.8, the requirement for on-site Non-Destructive Examination (NDE) of irradiated fuel assemblies was deleted because the facilities for NDE on-site are not available. Second, the operability requirement for aircraft fire detection system, Specification 3.17.2, was clarified from "before unit operation" to "shall be operational, or the failed components shall be placed in the accident mode."

The proposed Technical Specification changes of Attachment 1 have been reviewed by On-Site and Off-Site Review with the conclusion that there are no unreviewed safety questions.

Pursuant to 10 CFR 170, Commonwealth Edison has determined that this proposed amendment is a combined Class I and Class II amendment. As such, Commonwealth Edison has enclosed a fee remittance in the amount of \$1,600.00 for this proposed amendment. The basis for this determination is that the proposed changes are administrative in nature and do not have any safety or environmental significance.

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

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Three (3) signed originals and thirty-nine (39) copies of this letter are provided for your use.

Very truly yours,

D. L. Peoples

D. L. Peoples
Director of
Nuclear Licensing

DLP:WFN:rap

Attachment

SUBSCRIBED and SWORN to
before me this 23rd, day
of May, 1980

Nancy M. Dascenzo
Notary Public

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