



Commonwealth Edison
Zion Generating Station
Shiloh Blvd. & Lake Michigan
Zion, Illinois 60099
Telephone 312/746-2084

May 22, 1980

Mr. Edward Reeves
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

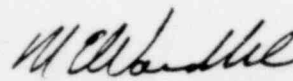
Dear Mr. Reeves:

As of March 30, 1980, all diesel generator tests performed at Zion Station have been in accordance with Regulatory Guide 1.108 as specified in the February 29, 1980 order. It has come to our attention that diesel generator starts for the safeguards actuation test (PT-10) and the diesel generator load sequencing test (TSS 15.6.35) cannot be counted in the 100 test data base. This is because these starts do not fulfill the one hour loading requirement of the Reg. Guide. The diesels cannot be loaded for one hour during the above mentioned tests because of operational and regulatory constraints. It is our intention to consider these starts as valid, successful tests, thereby, lowering the periodic testing frequency.

On May 19, 1980, this matter was discussed by yourself and Ed Fuerst, the Unit 1 Operating Engineer. It was decided that after the diesel is started by safeguards actuation under ESF conditions, it must be loaded to the safeguards load (4MW). Upon verification of lubricating oil and cooling water temperature stability the loaded run can be considered a valid, successful test.

Any test to prove operability of the diesel generator, whether it is a periodic test or a verification of standby A.C. power, would be a one hour loaded run as outlined in the Reg. Guide.

Your approval of this matter is requested.


N. E. Wandke
Superintendent
Zion Station

ATK/bvs

cc: W. F. Naughton

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