



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

May 30, 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  
Supplement to Proposed Change  
to Facility Operating License  
Nos. DPR-39 and DPR-48  
NRC Docket Nos. 50-295 and 50-304

References (a): April 22, 1980 letter from D. L. Peoples  
to H. R. Denton

(b): May 14, 1980 letter from J. G. Keppler to  
C. Reed

Dear Mr. Denton:

In Reference (a), Commonwealth Edison Company requested a change to Facility Operating License Nos. DPR-39 and DPR-48, Appendix A, Technical Specifications. The purpose of that amendment was to incorporate numerous administrative changes including, among other items, organizational changes.

Subsequent to the request of Reference (a), a management meeting was held on April 28, 1980 between Commonwealth Edison Company and NRC Region III to resolve certain items addressed in Reference (b) that were identified during a Health Physics Appraisal inspection of Zion Station. One specific item required the resolution of a "literal discrepancy" within the Zion Station Technical Specifications regarding the qualifications within the Zion Station Radiation - Chemistry Department. Resolution of this item requires a modification to the Administrative Controls, Section 6.1.D, page 300 of the Zion Station Technical Specifications. That page was modified in Reference (a) to reflect numerous corporate and station organizational changes. Therefore, in response to this item, Commonwealth Edison proposes amending and replacing that page with that contained in Attachment 1 to this letter. The modification and basis follows.

Revise Section 6.1.D (page 300) in Attachment 2 of Reference (a) from "...with the exception of the Rad-Chem Supervisor who shall meet..." to "...with the exception of the Rad-Chem Supervisor or Lead Health Physicist, who shall meet ...." This

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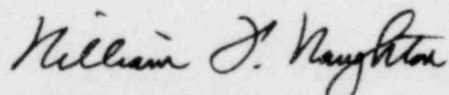
change will allow for either the Rad-Chem Supervisor or the Lead Health Physicist to fulfill the qualifications of the Radiation Protection Manager. As outlined in Regulatory Guide 1.8, the Radiation Protection Manager should be an experienced professional in applied radiation protection at the nuclear facility dealing with radiation protection problems and programs. The Radiation Protection Manager should also be familiar with design features and operations of the nuclear plant that affect the potential for radiation exposure to the personnel. Since at Zion Station the Lead Health Physicist is directly involved with radiation protection problems and personnel exposure concerns, Commonwealth Edison has determined that the Lead Health Physicist can fulfill the responsibility of the Radiation Protection Manager, provided the Lead Health Physicist meets or exceeds the qualifications of Regulatory Guide 1.8.

The revised change of Attachment 1 has been reviewed by Commonwealth Edison On-Site and Off-Site Review with the conclusion that there are no unresolved safety questions.

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

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

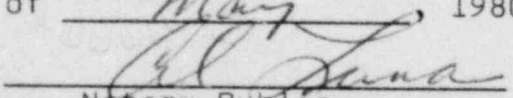
Very truly yours,



William F. Naughton  
Nuclear Licensing Administrator  
Pressurized Water Reactors

WFN:rap  
Attachment

SUBSCRIBED and SWORN to  
before me this 30TH day  
of May, 1980

  
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Notary Public