



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Docket Nos: 50-295 and 50-304

October 27, 1989

Mr. Thomas J. Kovach
Nuclear Licensing Manager
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Kovach:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE FROM TECHNICAL SPECIFICATION 3.17.2
REGARDING AIRCRAFT FIRE DETECTION RELATING TO DIESEL GENERATOR ROOM
AIR INTAKE DAMPER OPERABILITY - ZION NUCLEAR POWER STATION,
UNITS 1 AND 2

By letter dated October 26, 1989, Commonwealth Edison Company (CECo, the licensee) referenced the October 25, 1989 telephone conversation between NRC and CECo regarding a recent event at Zion station which necessitated a request for a Temporary Waiver of Compliance to Technical Specification 3.17.2. This Technical Specification states "the aircraft fire detection system shall be operational, or the failed components shall be placed in the accident mode." Technical Specification 4.17.2 states that "each fire detection circuit shall be tested every 6 months by simulating a signal equivalent to a fire condition and fan trip and associated damper closure verified to occur within 2 seconds." The aircraft crash dampers for 2A and 2B diesel generator room ventilation system took 2.8 seconds to close. Therefore, the licensee failed these dampers closed by isolating the air to the dampers. To protect the vent fans because their inlet dampers were now failed closed, the breakers were opened and the control room control switches were placed in the pull to lock position. The above set up a condition that was contrary to the requirements of the FSAR Section 9.10.6.2.2 which required the following: each DG room ventilation system was to start automatically on an EFS signal; the fan was to provide 70,000 CFM of cooling air to the room; and the maximum ambient room temperature was limited to 115° F.

On October 26, 1989, NRC and CECo discussed the appropriate corrective action to be taken to comply with the conditions that are required by the Temporary Waiver of Compliance procedure. Prior to the October 25, 1989 event, Commonwealth Edison had submitted a proposed amendment that was primarily a Probabilistic Risk Assessment of the aircraft detection system in an attempt to justify the position of removing the requirements for operation of this system from the Technical Specifications. Upon NRC review of the submittal, NRC determined that additional information would be necessary to support this position and requested that the information be submitted on an expedited basis for review and consideration as a possible resolution to the event. In addition, CECo suggested a modification to the aircraft detection system

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Mr. Thomas J. Kovack

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which would improve damper closure time in order to achieve compliance with the existing 2-second requirement. These two actions would be performed in parallel and completed according to the following CECO schedule:

1. Forward additional data to NRC by November 6, 1989.
2. Install a modification to improve closure by November 13, 1989.

This Temporary Waiver of Compliance which was effective on October 25, 1989 will remain in effect through November 13, 1989 at which time CECO is expected to have completed the aircraft fire detection modification such that the associated damper closure occurs within 2 seconds as required by Technical Specification 4.17.2.1.b.

Sincerely,

js/

John A. Zwolinski
Assistant Director
for Region III
Division of Reactor Projects III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

cc: See next page

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10/27/89

LETTER TO KOVACH 10/27/89

Official Record Copy

Mr. Thomas J. Kovach
Commonwealth Edison Company

Zion Nuclear Power Station
Units 1 and 2

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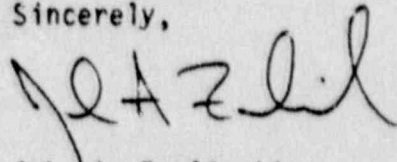
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