



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

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Docket Nos. 50-295
and 50-304

July 16, 1980

Mr. D. Louis Peoples
Director of Nuclear Licensing
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Peoples:

We have reviewed the existing Technical Specifications for Zion Station Units No. 1 and No. 2 against NUREG-0452, "Standard Technical Specifications for Westinghouse PWRs." This review was done to satisfy paragraph F.1.(f)(3) "Action Plan for Indian Point and Zion" forwarded to Mr. Cordell Reed and Mr. Harold Denton's letter dated April 9, 1980.

The subtask F.1.(f)(3) required a review of plant Technical Specifications with the intent of minimizing plant operations during safety system unavailability. Further, Limiting Conditions for Operation for these units should be at least as stringent as those required by current Standard Technical Specifications. Our review indicates that an upgrading is necessary for Zion Station Technical Specifications as shown on the enclosure.

To assist you in identifying areas where upgrading is needed, the enclosure to this letter was transmitted to your staff on April 7, 1980. However, we have not yet received license applications specifically relating to our areas of concern. Your application dated April 22, 1980 contained numerous other proposed administrative changes, but we feel that the upgrading identified in the enclosure should have received equal attention.

You are requested to provide license applications for the enclosed listing of Technical Specification deviations within 30 days of receipt of this letter.

Sincerely,

Steven A. Varga
Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosures:
As Stated

cc: w/enclosures
See next page

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Mr. D. Louis Peoples
Commonwealth Edison Company

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ZION UNIT 1 AND 2 TECHNICAL SPECIFICATIONS DEVIATIONS

(Numbers in parenthesis reference the applicable W-STS Specification)

1.0 K	Upgrade the definition of Operable to include items listed in the <u>W</u> -STS. (1.6)
1.0 N	Upgrade the Surveillance Interval to limit the time to a maximum of 3.25 for any three consecutive surveillance intervals. (4.0.2)
2.1.1 C.	Include the manual reactor trip. (2.2.1)
Figure 2.1-2	Verify that this figure is still conservative.
Table 3.1-1	Include a requirement to maintain at least one source range monitor operable when shutdown for core monitoring. (Table 3.3-1)
Table 4.1-1	1) Revise item 4 to indicate that this is the high <u>positive</u> rate trip. 2) Revise note R to be consistent with definition J to limit maximum time to 20 months.
3.2.1.1.B	Verify that Figure 3.2-1 is still considered conservative. (3/4.1.1.1)
3.2.1.C.1	Revise to reflect limits on MTC in <u>W</u> -STS. (3/4.1.1.3)
3.2.1.D	Include a Minimum Temperature for Criticality. (3/4.1.1.4)
3.2.1.D	Include a requirement that part length control rods be fully withdrawn. (3/4.1.3.7)
3.2.1.F.1.c.	Expand to require that the boration flow path also be operable. (3/4.1.2.1 and 2)
3.2.2.B.	Revise to be consistent with <u>W</u> -STS, i.e., B.1.c should require a 3% per 1% reduction. (3/4.2.4)
3.2.2.C.1.	Revise to require at least 75% of all incore thimbles to be operable. (3/4.3.3.2)
3.2.3.A.	Revise to restrict misalignment to <u>+12</u> steps, indicated. (3/4.1.3.1)
3.2.3.B.6	Revise to require reanalysis of the accidents indicated in <u>W</u> -STS Table 3.1-1. (3/4.1.3.1)

- 3.2.3.D Include a requirement for rod position indication while shutdown. (3/4.1.3.3)
- 3.3.1.A. Include requirements that at least one RCP or RHR pump be in operation at all times. (3/4.4.1.1)
- 3.3.1.B Revise to require all steam generators to be operable. (3/4.4.5)
- 4.3.1.B.5.B Revise to submit the results of steam generator tube inspections in a Special Report.
- 3.3.1.D. Revise to specify a maximum pressurizer water volume. (3/4.3.4)
- 3.3.2.A.1 Upgrade to include maximum heatup and cooldown limits, i.e., 100°F per hour. (3/4.4.9.1)
- 3.3.2.F.3. Include a requirement to indicate the total accumulated SI actuations to date. (3/4.5.2)
- 3.3.3.A. Reduce the time to identify leakage to 4 hours. (3/4.4.6.2)
- 3.3.3.B Delete this provision.
- 4.3.4.D. Verify that these provisions are in accordance with 10 CFR 50, Appendix H. Recommend replacing with a statement indicating that removal will be per Appendix H. (4.4.9.1.2)
- 3.3.5 Revise this specification to include all the provisions of the W-STS. (3/4.4.7) Limits and sampling are not changed, however action and applicability are modified.
- 3.3.6 Expand to incorporate all the provisions shown in the W-STS. (3/4.4.8)
- Table 3.4-1 Expand to include instrumentation for Turbine Trip and Feedwater Isolation, Auxiliary Feedwater Actuation, and Loss of Power; also add to Table 4.4-1. (3/4.3.2)
- 3.7.2 Verify that any one auxiliary feedwater pump provides adequate flow or revise specification to require 200% capacity for startup and limit out of service time at 100% to 72 hours. (3/4.7.1.2)
- 3.8.1.C. and D. Limit the out of service time to 72 hours. (3/4.5.2)

- 3.8.1.G. Limit the out of service time to one hour. (3/4.5.4 and 5)
- 3.8.2.C. and D. Limit the out of service time to 72 hours. (3/4.5.2)
- 3.8.2.C and D Limit the out of service time to 72 hours. (3/4.5.2)
- 3.8.6.C and D. Limit the out of service time to 72 hours and one hour respectively. (3/4.7.3)
- 3.9.5.B Revise per W-STS. (3/4.9.4)
- 3.10.1.A. Include the leakage testing acceptance criteria. (3/4.6.1.2 and 3)
- 3.10.2 Upgrade per the requirements of the W-STS. (3/4.6.1.7)
- 3.11 and 3.12 Should be revised to the Model Radiological Effluent Technical Specifications which have been provided under previous letters.
- 4.13.2 Include testing of the ventilation system per the W-STS. (3/4.9.12)
- 3.13.3 Include requirement that no fuel handling be allowed unless integrity is maintained. (3/4.9.4)
- 3.13.7 Include a required minimum water level above spent fuel. (3/4.9.10 and 11)
- 4.15.1.B Upgrade EDC testing per W-STS. (3/4.8.1.1)
- 4.15.D. Upgrade battery testing per W-STS. (3/4.8.2.3)
- 3.15.2 Revise out of service and remaining source testing per W-STS. (3/4.8.1.1)
- 3.17 List the applicable systems (include the control room) and provide operability requirements.
- 4.17 Upgrade to the requirements of W-STS. (3/4.7.8)
- 3.18 Revise per W-STS activity requirements if more restrictive. (3/4.7.1.4)

The following Specifications in the W-STS should be included in the Zion Technical Specifications if applicable:

1. Seismic and Meteorological Instrumentation (3/4.3.3.3 and 4)
2. Chlorine Detection Systems (3/4.3.3.7)
3. Remote Shutdown Instrumentation (3/4.3.3.5)
4. Overpressure Protection Systems (3/4.4.9.3)
5. Containment Ventilation System (3/4.6.1.8)
6. Hydrogen Analyzers (3/4.6.5.1)
7. Condensate Storage Tank (3/4.7.1.3)
8. Sealed Source Contamination (3/4.7.10)
9. Electrical Equipment Protection Devices (3/4.8.3.1 and 2)