



**Commonwealth Edison**  
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Address Reply to: Post Office Box 767  
Chicago, Illinois 60690 - 0767

November 22, 1989

Mr. A. Bert Davis  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Zion Nuclear Power Station, Unit 2  
License Number DPR-48  
Request for Enforcement Discretion  
Service Water Pump Operability Requirements  
NRC Docket No. 50-304

Reference: November 22, 1989 telephone conversation between  
T.P. Joyce and J. Hinds

Dear Mr. Davis:

The purpose of this letter is to request a relief from a Technical Specification (TS) Limiting Condition For Operation (LCO) by using the guidance outline in the "Enforcement Discretion" process. Specific relief is requested from the requirements of Zion Station TS 3.8.7, Service Water System. This letter confirms the commitment that was made during the course of the November 22, 1989 telephone conversation.

On Wednesday, November 22, 1989, Unit 2 was operating at power with the 2B Service Water (SW) pump inoperable for repair of supporting equipment. This condition placed the unit on a seven day clock. At 0715 hours, the "O" Diesel Generator was declared inoperable. This condition rendered the 2A (SW) pump inoperable due to loss of its emergency source of electrical power. This placed Unit 2 in a LCO 4 hour clock to Hot Shutdown in accordance with T.S. 3.8.7.D. 2B SW pump has been repaired, however, in order to declare the pump operable, a 4 hour Performance Test (PT) must be run. This will remove Unit 2 from the 4 hour LCO.

The specific purpose of this request is to allow an extension of the 4 hours to Hot Shutdown window by 3 hours in order to complete the Performance Test run of the 2B SW pump. Zion Station requests temporary relief in this circumstance based on the following reasons: 1) The test run of the 2B SW pump was started at 1008 which was prior to the expiration of the 4 hours to Hot Shutdown requirement, providing assurance that the pump will actually run, 2) The undesirable stress of the shutdown transient will be avoided, 3) The unit has been ramped to 20% power and will hold at this power until satisfactory completion of the test run, 4) Any pump abnormalities observed during the test run will result in completing the shutdown of Unit 2, and 5) At this time, the 2B SW pump is being closely monitored during its run and has shown no abnormal conditions.

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Mr. A.B. Davis

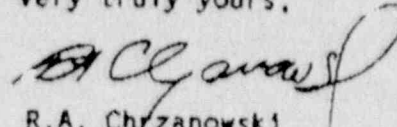
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In conclusion, Commonwealth Edison Company requests that the merit of this relief be evaluated considering the facts that this problem is non recurring, was not reasonably foreseen by the licensee, and can be corrected in a relatively short period of time.

If you have any further questions regarding this matter, please contact this office.

Very truly yours,



R.A. Chyzanowski  
Nuclear Licensing Administrator

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cc: J. Hinds-R III  
C. Patel-NRR  
J.D. Smith-Zion SRI