



Commonwealth Edison

Zion Generating Station
101 Shiloh Blvd.
Zion, Illinois 60099
Telephone 312/746-2084

November 28, 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-
"O" Diesel Generator Operability
Requirements.
NRC Docket No. 50-304

Reference: November 28, 1989 telephone conversation between T. Joyce and
J. D. Smith

Dear Mr. Davis:

The purpose of this letter is to request a relief from a Technical Specification (TS) Limiting Condition For Operation by using the guidance outline in the "Enforcement Discretion" process. Specific relief is requested from the requirements of Zion Station TS 3.15.2.C. This letter confirms the commitment that was made during the course of the November 28, 1989 telephone conversation.

On Tuesday November 28, 1989, Unit 2 was operating at power with "O" Diesel Generator (DG) inoperable due to completion of repairs to the #2 connecting rod bearing. The "O" DG had been declared inoperable at 0715 hours on November 22, 1989. This condition placed the unit on a 7 day clock to Hot Shutdown.

The specific purpose of this request is to allow an extension of the 7 days to Hot Shutdown clock by 8 hours. This additional period of time is necessary in order to perform the required Technical Specification operability run (PT-11) and a post-run evaluation. If at this time, the "O" DG cannot be declared operable, Unit 2 will be placed in Hot Shutdown by 1515 hours on November 29, 1989.

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Zion Station requests temporary relief in this circumstance based on the following reasons: 1) The undesirable stress of the shutdown transient will be avoided, 2) The "O" DG operability run will be in progress by 0715 hours on November 29, 1989 or the Unit will be placed in Hot Shutdown, 3) During the operability run, the "O" DG is capable of providing emergency power to its associated safeguard bus should it be required.

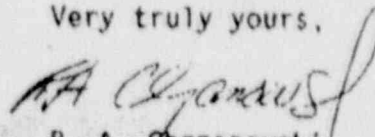
The following is a brief summary of the events leading up to the need for the additional extension of time:

On November 22, 1989 at 0200 hours, the "O" DG received a high connecting rod bearing temperature alarm during performance of PT-10, Safeguard Actuation Test. Upon inspection, it was discovered that the #2 upper and lower connecting rod bearing shells were found with excessive babbitt wear. While performing maintenance on the connecting rod bearing, oil samples were taken on the crankcase lube oil system. The results of the oil analysis determined that jacket water had entered into the lube oil system. The jacket water leaks were determined to be coming from the cylinder heads. Therefore, the 16 cylinder head liner-to-block gaskets were replaced. The scope of the above described work was within the 7 day Technical Specification time clock. As a common maintenance practice after performing work on the jacket water system, a jacket water leak test is performed. On November 27, 1989, at approximately 1700 hours, the jacket water leak test was performed and two additional jacket water leaks into the crankcase lube oil system were discovered. The leaks were determined to be coming from the #1 cylinder wrinkle belly. The wrinkle belly gaskets were replaced and the jacket water leak test was repeated. Additional water was found to be coming from the wrinkle belly-to-cylinder liner joint. At this time, the cylinder liner was inspected and a casting inconsistency was found. The cylinder liner has been replaced and the jacket water leak test will be repeated. The cylinder liner replacement is the reason for the request for Enforcement Discretion.

Throughout the "O" DG outage period, Commonwealth Edison Company utilized corporate nuclear engineering diesel experts and two diesel generator experts from the Byron Station to assist in the investigation. Cooper Bessemer technical representatives were on site and involved in the repairs on all shifts. Work was performed 24 hours a day from the initiation of the Technical Specification time clock on November 22, 1989. The leaks associated with the jacket water system were not reasonably foreseen by Zion Station personnel. The repairs are in progress and will be completed 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. Chrzanowski
Nuclear Licensing Administrator

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