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

October 24, 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
Proposed Amendment to
Facility Operating License Nos.
DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

Dear Mr. Denton:

Pursuant to 10 CFR 50.90, Commonwealth Edison Company hereby requests a change to Facility Operating License Nos. DPR-39 and DPR-48, Appendix B, Environmental Technical Specifications (ETS). The purpose of this amendment is to delete the pH requirement as listed on page 9 of Appendix B, Section 1.3.C or, in the alternative, change the pH requirement by referencng the station's USEPA/Illinois EPA National Pollutant Discharge Elimination System (NPDES) permit. For the latter, a proposed change is included in Attachment 1.

Commonwealth Edison's basis for requesting the proposed change is three-fold. First the USEPA/Illinois EPA NPDES permit regulates the pH of the station's condenser cooling water. Similarly, Appendix B of the ETS contains a requirement, Section 1.3.C, which, in essence, also does the same. Consequently, ther is a duplication which results in an unnecessary regulatory burden.

Secondly, the two pH requirements are nonconforming. The NPDES permit allows a pH range of 6.0 to 9.0 while the ETS lists a pH range of 6.0 to 8.0. In addition, the USEPA and Illinois EPA recognize and allow the station to utilize the buffering and dilution capability of the cooling water with regard to the NPDES pH requirement. The ETS pH requirement does not allow this. Again, the more restrictive ETS requirement results in an unnecessary burden in terms of treatment and expense.

The last basis for Commonwealth Edison's request involves the practicability of the pH requirement with regard to the natural condition of Lake Michigan water. Normally, the pH of Lake Michigan is above 8.0, the upper limit of ETS requirement. This is evidenced by the analysis of data as explained in Attachment 2. Consequently, the ETS pH requirement is more restrictive than the natural occurring pH of Lake Michigan.

In summary, Commonwealth Edison's request for a change in the pH requirement is based upon the considerations of duplicate requirements, conflicting limitations and practical application of the ETS pH requirement. Since the proposed change of Attachment 1 is embodied and controlled by the NPDES permit, granting the request will not, in any way, result in an adverse environmental effect on Lake Michigan.

The proposed change of Attachment 1 has been reviewed and approved by Commonwealth Edison On-Site and Off-Site Review with the conclusion that there will be no adverse environmental effects on Lake Michigan.

Pursuant to 10 CFR 170, Commonwealth Edison has determined that this proposed amendment is a combined Class I and Class III amendment. As such, Commonwealth Edison has enclosed as fee remittance in the amount of $4,400.00 for this proposed amendment. The basis for this determination is that the proposed changes involve a single environmental issue.

Please address any questions that you may 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,

W. F. Naughton

W. F. Naughton
Nuclear Licensing Administrator
Pressurized Water Reactors

Attachments (2)

cc: Resident Office - Zion

SUBSCRIBED and SWORN to
before me this 24TH,
day of October, 1980

Notary Public

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