October 22, 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 Supplement to Proposed Change To Facility License Nos. DPR-39

and DPR-48

NRC Docket Nos. 50-295 and 50-304

Reference (a): May 23, 1980 letter from D. L. Peoples

to H. R. Denton

Dear Mr. Denton:

In Reference (a), Commonwealth Edison Company requested a change to Facility Operating License Nos. DPR-39 and DPR-48, Appendix A, Technical Specifications. This submittal was made in response to an NRC request to all power reactor licensees. The purpose of the amendment was to define the term "OPERABLE" to be consistent with the definition used in the PWR Standard Technical Specifications to assure that no set of equipment outages would be allowed to persist that could result in the facility being in an unprotected condition.

Subsequent to the submittal of Reference (a), Commonwealth Edison proposed and the NRC approved an additional license amendment change to allow one service water pump to be out of service during a circulating water pump maintenance program. However, approval of the "OPERABLE" license amendment of Reference (a) without the inclusion of the attached supplement would prohibit that maintenance program. The proposed supplement of Attachment 1 states that the service water pump out of service for maintenance purposes is not to be considered a redundant system per the requirements of the proposed Section 3.02.b of Reference (a). Therefore, Commonwealth Edison requests the NRC Staff to include the technical specification change of Attachment 1 with the proposed license change of Reference (a).

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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 letter are provided for your use.

Very truly yours,

M. J. Naughter

W. F. Naughton

Nuclear Licensing Administrator Pressurized Water Reactors

attachment

cc: Resident Office - Zion

SUBSCRIBED and SWORN to before menthis

day of Cotoley,

Notary Public

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