



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

August 5, 1982

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 Change to Facility
Operating License Nos. DPR-39
and DPR-48
(Control Rod System Operability)
NRC Docket Nos. 50-295 and 50-304

Reference (a): July 20, 1981, letter from
R. F. Heishman to Cordell Reed.

Dear Mr. Denton:

Commonwealth Edison hereby requests a change to Facility Operating License Nos. DPR-39 and DPR-48 for Zion Station. Changes are requested to Technical Specification Section 3.2.3 regarding Control Rod System Operability. These changes clarify the definition of an inoperable control rod and revise the actions required in the event of a "rod urgent failure" alarm.

The existing Technical Specifications require that if more than one control rod is inoperable, the reactor must be shutdown within four hours. It is proposed that if the control rods are inoperable as a result of control failure as evidenced by a rod urgent failure alarm, no power reduction is necessary. A rod urgent failure alarm indicates that the electronic equipment which provides timed current pulses to move the control rods is malfunctioning. This condition in no way affects the ability of the control rods to be tripped.

Requiring a plant shutdown for rod urgent failure alarms has the undesirable consequence of subjecting the plant to an unnecessary transient and challenging plant safety systems. In I.E. Inspection Report Nos. 50-295/81-09 and 50-304/81-05 (reference (a)), the NRC acknowledged this fact and requested Commonwealth Edison to take steps to reduce the likelihood of such unnecessary system challenges.

The Attachment to this letter contains the revised Technical Specification pages. With the exception of the requirement to shutdown for rod urgent failure alarms, all existing requirements concerning control rod system operability are maintained.

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Pursuant to 10 CFR 170, Commonwealth Edison has determined that the proposed amendment is a combined Class III and Class I amendment. As such, Commonwealth Edison has enclosed a fee remittance of \$4,400 for this proposed amendment.

Please address questions regarding this matter to this office.

Three (3) signed originals and thirty-nine (39) copies of this transmittal are provided for your use.

Very truly yours,

F. G. Lentine

F. G. Lentine
Nuclear Licensing Administrator

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cc: D. W. Hayes
NRC Region III

SUBSCRIBED and SWORN to
before me this 5th day
of August, 1982

Rosalie A. Puerta
Notary Public

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