

Commonwealth Edison 1400 Opus Place Downers Grove, Illinois 60515

November 29, 1990

U.S. Nuclear Regulatory Commission ATTN: DOCUMENT CONTROL DESK Washington, D.C. 20555

> Subject: Zion Station Units 1 and 2 Revised Schedule for Implementation of Generic Letter 89-04 Guidance NRC Docket Nos. 50-295 and 50-304

References:

- (a) Generic Letter 89-04, dated April 3, 1989.
 - (b) M. Richter (CECo) letter to U.S. NRC, dated October 2, 1989.
 - (c) G. Trzyna (CECo) leiter to T.E. Murley (NRC), dated November 7, 1989.
 - (d) Minutes of the Public Meetings on Generic Letter 89-04, dated October 25, 1989.
 - (e) D. Taylor (CECo) letter to U.S. NRC, dated August 16, 1990.

Dear Sir:

Generic Letter 89-04 (Generic Letter) was issued to provide guidance to 1: sees on frequently identified weaknesses of Inservice Testing (IST) Programs. As reported in Reference (b), all of Commonwealth Edison Company's (CECo) nuclear stations required IST Program and implementation procedure revisions to conform with the guidance/positions provided in the Generic Letter. Additionally, Reference (b) provided a schedule for the completion of these actions for each station. This letter presents a revised schedule for Zion Station.

Reference (e) indicated for Zion Station that the IST Program and implementation procedure revisions necessary to conform with the guidance/positions in the Generic Letter were expected to be completed by November 30, 1990. The majority of the implementation procedure revisions, as a result of the Generic Letter, are associated with check valve testing and stroke time testing of the power operated valves. Currently, limiting values of stroke time for power operated valves have been "stablished, and the implementation of associated procedure revisions are in progress. It is now expected that the remaining procedure revisions for the power operated valves will be completed by December 31, 1990. The scope of check valves in the IST program is larger than originally anticipated. Therefore it is now expected that flow values for full stroke testing of check valves will be established and implementation of associated procedure revisions will be complete by April 30, 1991. Regarding the IST Program revision, Zion Station, which was identified as a "Table 1" plant in the Generic Letter, was issued a Safety Evaluation Report (SER) in February 1986. Subsequently a revised IST Program

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was submitted on November 7, 1989 (Reference (c)). It is CECo's understanding that a Supplemental SER will be issized in the near future in response to Reference (c). Based on recent discussions with the NRC, and CECo's understanding of the guidance in Reference (d). an IST Program revision necessitated by the guidance/positions in the Generic Letter may be submitted after receipt of the Supplemental SER. Therefore, the Zion Station IST Program revision will be submitted within 90 days of receipt of the Supplemental SER or April 30, 1991, whichever is later.

Please direct any questions that you may have on this letter to this office.

Respectfully,

D.L. Taylor Generic Issues Administrator

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cc: A.B. Davis - Regional Adminstrator, Region III
Zion Resident Inspector
C. Patel - NRR Project Manager