



Commonwealth Edison
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 Address Reply to: Post Office Box 767
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December 9, 1981



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
NRC Docket Nos. 50-295 and 50-304

Reference (a): September 9, 1980, letter from
 S. A. Varga to J. S. Abel.

Dear Mr. Denton:

By transmittal of reference (a), the NRC issued Amendment No. 57 to Facility Operating License No. DPR-39 and Amendment No. 54 to Facility Operating License No. DPR-48 for Zion Station. These amendments provided a temporary Technical Specification change to allow continued operation of the Zion units while maintenance was performed on the circulating water pumps. At the time of issuance of these amendments, it was expected that the maintenance program would be completed about December 31, 1981. This letter is submitted to request a two-year extension of the provisions of these amendments to December 31, 1983.

This extension is required for the following reasons. First, our estimate of the extent of the repairs required for each circulating water pump has increased. On the circulating water pumps that have been overhauled to date, it was found that in addition to the expected routine maintenance items, extensive work was required to refurbish the bearings and pump shafts. It is anticipated that this work will be required for the remaining pumps, also. Second, as a result of a study performed to investigate a condition of high vibration that existed in some circulating water pumps, a modification to the inlet turning vanes has been recommended. Performance of this modification is expected to require additional time to complete.

Third, it has become apparent that certain maintenance is desirable at this time for the service water pumps as well. Three service water pumps have been inspected and overhauled, and each of their impellers has been found to be in need of refurbishing.

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Performance of this maintenance on the remaining service water pumps would be facilitated by an extension of the provisions of the amendments.

The extensive repair program described must be performed within the framework of certain scheduling constraints. Circulating water pump maintenance requires draining a section of the intake forebay, which requires placement of stop-logs in the forebay. This operation cannot be carried out in the coldest winter months due to icing conditions. During periods of relatively high lake water temperature during the summer months, three circulating water pumps per unit are required for operation of the unit at full capacity. In view of these constraints, it is now estimated that an additional two years will be required for completion of the maintenance program.

The justification for the extension is the same as that which was provided for the original amendments. Specifically, the Zion FSAR (Section 9.6 and answer to Question 9.1) and the October 6, 1972, NRC SER (pages 9-5 and 9-6) state that only two service water pumps are required for a unit in normal operation and that only one service water pump is required for emergency shutdown or accident conditions. Therefore, having five of six water pumps in service will provide sufficient cooling for any postulated loss of coolant accident coincident with a loss of offsite power and any other single failure of a active component. The NRC confirmed this finding in the SER for the issuance of the original amendments (Reference (a)).

Attachment 1 to this letter contains the proposed changes to the Technical Specifications for the extension of the amendments. A minor wording change has been made to the explanatory note to state that both the circulating water pumps and the service water pumps are included in the planned maintenance program. It should be noted that this change does not alter the conditions for reduced service water pump availability specified by the original amendments.

Commonwealth Edison has determined that the proposed change is a combined Class III and Class I Amendment per 10 CFR 170.22. As such, Commonwealth Edison has enclosed a fee remittance in the amount of \$4,400 for this proposed amendment. Commonwealth Edison has concluded that the proposed amendment involves a single safety issue that does not involve a significant hazards consideration.

Three (3) signed originals and thirty-seven (37) copies of this transmittal are provided for your review and approval.

H. R. Denton

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Please address questions concerning this matter to this office.

Very truly yours,

F. G. Lentine

F. G. Lentine
Nuclear Licensing Administrator

Enclosure

Attachment

SUBSCRIBED AND SWORN to
before me this 9th day
of December, 1981.

Rosalie A. Puenta
Notary Public

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