Docket File



NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

December 5, 1990

Docket Nos. 50-295 and 50-304

> Mr. Thomas J. Kovach Nuclear Licensing Manager Commonwealth Edison Company-Suite 300 OPUS West III 1400 OPUS Place Downers Grove, Illinois 60515

Dear Mr. Kovach:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - ZION STATION UNITS 1 AND 2, DET (INSERVICE TEST PROGRAM)

Upon the staff's review of your response, dated November 2, 1990, to the NRC Diagnostic Evaluation Team (DET) report for Zion Station, Units 1 and 2, regarding the scope of the ASME Section XI valve testing program, the following additional information is requested.

- 1. The response on page 22 states that approximately one-third of the valves not being tested were classified as Category B passive in the original inservice test (IST) program and did not require testing by ASME Section XI. CECo should discuss the criteria used to classify a motor operated valve (MOV) as a passive valve and demonstrate the use of these criteria to those DET identified service water (SW) MOVs.
- 2. Also, on page 22, the report states that other valves not previously tested by the IST program were excluded by Code allowed exemptions. However, no documented bases for exempting these valves from the IST program could be found. CECo should reconstruct the missing bases and provide them for staff review.
- 3. On pages 22 and 23, the report indicates that Zion is currently in the process of developing and implementing an effective program using the consultants final report recommendations (dated 1/30/90) and the guidance from NRC Generic Letter 89-04. Since the consultant has recommended inclusion of a significant number of valves for inservice testing, CECo should provide bases or justification for excluding any of those valves.

9012110130 901205 PDR ADOCK 05000295 PDC DFOL 10

In order for the staff to complete their review and to resolve the DET's concern on the valve scope issue, please provide a response to the above three concerns within 45 days.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

Sincerely,

Original Signed By:

Robert M. Pulsifer, Project Manager Project Directorate III-2 Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

cc: See next page

DISTRIBUTION:

Docket Files
NRC & Local PDRs
PDIII-2 r/f
BBoger
JZwolinski
RBarrett
RPulsifer
CPatel
CMoore
OGC
ACRS(10)
EJordan
PDIII-2 Plant File

BOCUMENT NAME: ZION IST

Office: A/PDIII-2 Surname: CMoore Date: \2/ /90 PM/PDIII-20) RPulsifer tg /2/04/90

PD/P0/11/1/ RBarrete 11/5 /90 Mr. Thomas J. Kovach Commonwealth Edison Company Zion Nuclear Power Station Unit Nos. 1 and 2

CC:

Michael I. Miller, Esq. Sidley and Austin One First National Plaza Chicago Illinois 60690

Dr. Cecil Lue-Hing Director of Research and Development Metropolitan Sanitary District of Greater Chicago 100 East Erie Street Chicago, Illinois 60611

Phillip Steptoe, Esq. Sidley and Austin One First National Plaza Chicago, Illinois 60603

Mayor of Zion Zion, Illinois 60099

Illinois Department of Nuclear Safety Office of Nuclear Facility Safety 1035 Outer Park Drive Springfield, Illinois 62704

U.S. Nuclear Regulatory Commission Resident Inspectors Office 105 Shiloh Blvd. Zion, Illinois 60099

Regional Administrator, Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road, Bldg. #4 Glen Ellyn, Illinois 60137

Robert Neumann Office of Public Counsel State of Illinois Center 100 W. Randolph Suite 11-300 Chicago, Illinois 60601