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November 24, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Zion Station Units 1 and 2
Response to Generic Letter No. 82-22
Steam Generator Tube Integrity
NRC Docket Nos. 50-295/304

Reference (a): October 26, 1982 letter from D. G. Eisenhut
to All PWR Licensees

Dear Mr. Eisenhut:

This is to provide information concerning steam generator tube integrity at Zion Station, as requested by your letter of reference (a).

This information is being provided in a narrative rather than a tabular format. In our judgement, it is more appropriate to present a general discussion that provides an overall perspective on the subject. The material that follows provides that perspective for Zion Station.

Over a period of approximately 9 years of operation, Zion's steam generator performance has been generally satisfactory. No unscheduled outages can be attributed to steam generator-related difficulties. While some forms of tube degradation have been observed at Zion, no tube sleeving has been required to repair tube degradation. Prior to 1982, only a few tubes on each unit had been plugged as a result of routine inservice inspections. In 1982 a relatively larger number of tubes were plugged on Unit 1, bringing the total to approximately 4%. Most of this total resulted from a decision to plug all tubes in Row 1 of the steam generator as a precautionary measure, due to a potential problem caused by the manufacturing process which is unique to the first two rows.

Costs associated with steam generator maintenance and repair have included those of routine eddy current examinations, manway cover removal and replacement, and sludge lancing. With the exception of 1982, these costs have been small, and no replacement power costs have been attributable to steam generator work. In

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1982, the Unit 1 steam generator tube ends were damaged as a result of a loose part having been left in the primary system at the previous refueling outage. Extensive costs were incurred in the performance of the necessary repairs and additional eddy current examinations were required, including some costs associated with replacement power. Corrective action has been taken to prevent the recurrence of steam generator damage due to loose parts.

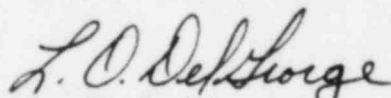
Both the number of workers receiving measurable radiation doses from steam generator work and the percentage of total annual employee dose attributable to steam generator work has been small (on the order of a few percent), with the exception of 1982. The repair of the damage to the Unit 1 steam generator resulted in an increase in radiation exposure for 1982.

Temporary workers represented an average of 80% of the total of workers involved in steam generator work over the period 1979-1982. However, it should be noted that temporary workers represented an average of 63% of the total work force employed at the Station. This reflects Commonwealth Edison's practice, common to all of our nuclear and large fossil stations, of hiring temporary workers to fill peak needs during maintenance and refueling outages. Commonwealth Edison has used independent firms to recruit some of these temporary workers.

Finally, Commonwealth Edison anticipates no major steam generator repairs for the Zion units in the next five years.

Please address questions regarding this matter to this office.

Very truly yours,



L. O. DelGeorge
Director of Nuclear Licensing

cc: B. Lee, Jr.

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