



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

February 1, 1991

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: TEMPORARY WAIVER OF COMPLIANCE FROM TECHNICAL SPECIFICATIONS AND  
CONFIRMATORY ORDER TO EXCLUDE TWO PATHWAYS ON UNIT 2 AND ONE  
PATHWAY ON UNIT 1 FROM APPENDIX J TYPE C LEAK TESTING REQUIREMENTS  
(TAC NO. 79619)

On January 29, 1991, you informed the staff that a need existed to modify your Technical Specifications (TS) for Zion Unit 2 and possibly Unit 1 based on your on-going program to evaluate all containment penetrations to assure compliance with Appendix J. The valves identified for Unit 2 are manual valve (2S18961) located outside containment, Penetration 76-the Accumulator Test Line, check valve (2RC8079) located inside containment and Penetration 80-Relief Valve Header to Pressurizer Relief Tank. In addition, for Unit 1, you committed to perform a Type C test on valve 1S18961 when the unit is in an outage of sufficient duration. Further, you stated that relief may also be requested for Unit 1, specifically check valve (1RC8079) located inside containment and Penetration 80-Relief Valve Header to Pressurizer Relief Tank. Following the self-identification of these valves, not currently being subjected to Appendix J criteria, Zion Unit 2 entered TS 3.0.3 which requires the initiation of a plant shutdown in one hour and bringing the plant to hot standby within four hours. The plant entered the action statement at approximately 2:45 p.m. CST.

During our conversation with you, the orderly shutdown of the plant was interrupted for three hours with the acknowledgement of NRC management. The plant power was decreased from 65% to 40%. This decision to slow the rate of shutdown was based on the length of time in service of these valves, the importance of immediately testing these valves, and other mitigating factors such as line size and the seismic classification. In the interruption to the adherence to TS 3.0.3, we essentially accepted responsibility for the plant to modify its shutdown rate and thereby approved a temporary waiver of compliance (TWOC) to extend TS 3.0.3 for the period of time that we were discussing the merits of the TWOC for the valves identified above.

Following the discussion presented by you in addressing the seven criteria contained in the staff's guidance regarding a TWOC, dated February 22, 1990, it was concluded that the staff would consider and act upon an emergency TS

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request. Concern was expressed by the staff regarding the duration the TS relief could be in effect. It was determined that you should be aware that the TWOC would be in effect for a limited period of time (through February 15, 1991). Within this time period, it is requested that you provide a formal presentation to the staff regarding this request, including a discussion of the technical merits and duration the plant could operate without testing these valves.

This letter serves to confirm the oral approval granted on January 29, 1991, which put in place a TWOC through February 15, 1991. This letter also confirms the following interim measures made by you:

- (1) radiographic inspection or use of other positive means to verify the integrity of valves 1/2 RC8079;
- (2) install a blind flange on the piping outboard of valve 1/2S10003 when not in use for testing;
- (3) administratively lock close manual valve 2S10004;
- (4) Type C test valve 1S18961; and
- (5) if 2S18961 is to be opened, a local operator will remain at the valve and be in communication with the control room.

To address any concerns which could arise regarding the interruption to the orderly shutdown commencing on January 29, 1991, it is our position that once a TS 3.0.3 has been entered, exiting can only be accomplished via appropriate disposition of the specific issue which originally required entering the TS action statement. However, we note that, with appropriate justification, we would consider a Regional TWOC to extend TS 3.0.3 for a short period of time to resolve technical issues such as the one that is the subject of this letter.

In addition, it is strongly recommended that, in the future, issues such as this should be identified to the NRC early enough to alleviate the need for an unnecessary plant transient. It is also expected that your staff should be prepared to discuss the issues associated with the pending request, and your entire leak rate testing program, at the meeting scheduled for February 6, 1991, at 10:30 a.m., in Rockville, Maryland.

**Original Signed By:**

John A. Zwolinski, Assistant Director  
for Region III Reactors  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

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Document Name: ZION TECHNICAL SPECIFICATIONS

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Commonwealth Edison Company

Zion Nuclear Power Station  
Unit Nos. 1 and 2

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