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May 31, 1994

Mr. William T. Russell, Director
 Office of Nuclear Reactor Regulation
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Attention: Document Control Desk

Subject: Zion Station Units 1 and 2
 Inservice Inspection Program Update
NRC Docket Nos. 50-295 and 50-304

- References:
- a) June 27, 1983 letter from F. Lentine to H.R. Denton
 - b) February 11, 1986 letter from S. Varga to D. Farrar
 - c) November 7, 1989 letter from G. Trzyna to USNRC
 - d) October 31, 1991 letter from R. Barrett to T. Kovach
 - e) June 15, 1993 letter from T. Simpkin to T. Murley
 - f) February 22, 1994 letter from J. Dyer to D. Farrar

Dear Mr. Russell:

With Reference a) Commonwealth Edison Company (CECo) submitted the Inservice Inspection Program for the Second Ten Year Interval. The Safety Evaluation Report (SER) approving the program was transmitted via Reference b). This SER provided conditional approval to relief request IWB-2.

Reference c) modified the program with relief request IWB-11, seeking relief from the Code-required volumetric examination of the pressurizer surge nozzle to vessel weld. Conditional approval was provided with Reference d).

The Inservice Inspection plan was further modified with relief request IWB-13, transmitted via Reference e). This request sought relief from the volumetric examination of the pressurizer surge nozzle inner radii, and was approved with Reference f).

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Mr. W.T. Russell

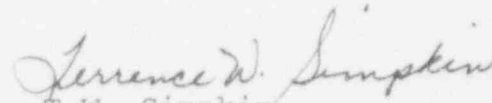
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The purpose of this letter is to update the staff with the results of Zion's best-effort examinations required by the SERs approving the relief request. These results are detailed in the attachment to this letter, along with Zion plans for the upcoming Unit 2 refueling outage.

Please address any questions to this office.

Sincerely,


T.W. Simpkin

TWS/gp

Attachment

cc: J. Martin, Region III
C.Y. Shiraki, Project Manager - NRR
J.D. Smith, Senior Resident Inspector - Zion

ATTACHMENT

Relief Request IWB-2 requested relief from performing volumetric examinations on all Class 1 nozzle inner radii. For the pressurizer head nozzles, visual examinations from the manway (when disassembled near the end of the inspection interval) would be performed as an alternative examination. This relief request was granted provided that volumetric examinations were performed to the extent practical. During the Unit 1 Fall 1993 refueling outage, Zion Station was able to perform volumetric examinations on the pressurizer head nozzles. Therefore, Relief Request IWB-2 which requested relief from performing volumetric examinations on all Class 1 nozzle inner radii is not needed for the pressurizer nozzles.

Relief request IWB-11 requested relief from performing volumetric examinations on the Unit 2 Pressurizer surge nozzle to vessel weld. The basis of the relief request was that high radiation exposure to personnel would result when removing the insulation since the pressurizer heaters would have to be disconnected. Even if the insulation was removed, UT scanning is limited because the nozzle configuration limits transducer contact and the pressurizer heaters limit scanning. The proposed alternative exam was to perform the Code required VT-2 exams and use the data from inspections of the nozzle to pipe weld as well as other Unit 2 nozzle to vessel welds.

Relief request IWB-11 was granted provided that a visual examination be performed on the inside surface of the nozzle to vessel weld.

During the Unit 1 Fall 1993 refueling outage, an attempt was made to inspect the inside surface of the Unit 1 Pressurizer nozzle inner radii which included the area of where the nozzle to vessel weld would be if the Unit 1 pressurizer surge nozzle was welded to the vessel (the Unit 1 pressurizer head is integrally cast). A small 2" diameter inspection camera was lowered down the pressurizer from the manway. Unfortunately, baffle plates internal to the pressurizer surge nozzle. Approximately 3 person rem was expended to perform the exam and to remove and replace the manway. Manway removal was complicated by the fact that some of the manway bolts were seized since the manway bolts were seized since the manway had not been previously removed within the last ten years.

It is expected that the Unit 2 pressurizer surge nozzle to vessel weld surface and the surrounding area will be similarly inaccessible. As a result, it is not possible to perform a VT-3 visual examination of the inner surfaces of the pressurizer surge nozzle for the Unit 2 pressurizer. Zion Station has determined that inspections of the Unit 2 pressurizer surge nozzle to vessel weld surface and the surrounding area is not possible and will not be performed. The original alternative exams which required that VT-2 examinations conducted at the code required frequency will be performed. The data from inspections of the nozzle to pipe weld as well as other Unit 2 nozzle to vessel welds will be used to evaluate the condition of the pressurizer.

Relief request IWB-13 requested relief from performing volumetric exams on the pressurizer surge nozzle inner radii. The basis of the relief request was that high radiation exposures would be obtained when removing the insulation since the pressurizer heaters would have to be disconnected. The insulation covering the pressurizer surge nozzle could be removed. However, the "blend region" which is the optimal area of scanning would still not be accessible and a limited exam conducted from the nozzle would not produce meaningful data to assess the condition of the nozzle inner radii. The proposed alternative exam was to perform the Code required VT-2 exams. In addition, an attempt would also be made to perform a visual inspection on the inside surface of the nozzle inner radii. The presence of a debris screen would possibly hinder access to the pressurizer surge nozzle inner radii surface. Examination limitations would be noted in the examination data sheet and in the outage summary report.

Relief request IWB-13 was granted provided that a thorough VT-3 visual examination of the debris screen and surrounding inner surfaces of the pressurizer surge nozzle be performed.

During the Unit 1 Fall 1993 refueling outage, an attempt was made to inspect the inside surface of the Unit 1 Pressurizer nozzle inner radii. A small 2" diameter inspection camera was lowered down the pressurizer from the manway. Unfortunately, baffle plates internal to the pressurizer prohibited access to the debris screen and the surrounding inner surfaces of the pressurizer surge nozzle. Approximately 3 person rem was expended to perform the exam and to remove and replace the manway. Manway removal was complicated by the fact that some of the manway bolts were seized since the manway had not been previously removed within the last ten years.

It is expected that Unit 2 pressurizer surge nozzle inner radii surface and the surge nozzle to vessel weld surface and the surrounding area will be similarly inaccessible. Attempting to perform visual examinations will not provide any useful information to access the condition of the pressurizer surge nozzle. Accordingly, Zion Station has determined that inspections of these surfaces are not possible and will not be performed. VT-2 examinations conducted at the code required frequency will be performed as required. The Unit 2 pressurizer head nozzle inner radii will be volumetrically examined as required. The station does not intend to disassemble the Unit 2 Pressurizer manway.