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Docket Nos. 50-295  
and 50-304

Mr. Louis O. DelGeorge  
Director of Nuclear Licensing  
Commonwealth Edison Company  
Post Office Box 767  
Chicago, Illinois 60690

Dear Mr. DelGeorge:

On March 9, 1982, we transmitted to Commonwealth Edison Company (CECo) a set of proposed Technical Specifications on the Zion Station auxiliary feedwater system. Those Technical Specifications allowed one motor-driven pump to be out seven days, the turbine-driven pump to be out up to seven days, so long as every measure is taken to restore the pump as soon as possible, and two pumps to be out for 72 hours. In discussions with CECo staff on July 2, 1982, we requested that the out-of-service times be examined using probabilistic risk analysis (PRA) methodology. In subsequent discussions, CECo provided an informal analysis dated July 9, 1982.

We have now performed evaluations of the effects on the availability of the Auxiliary Feedwater System (AFWS) resulting from various allowable outage times for two AFW pumps which show only an insignificant effect on the AFWS availability if a second pump is allowed to be inoperable for as much as eight hours (rather than 72 hours) before proceeding to hot standby within six hours thereafter and thence to hot shutdown within the next six hours. In our judgment, it is prudent to allow some time period to assess the cause of a loss of redundancy in the AFWS rather than immediately challenging the one operable pump by initiating a reactor shutdown. Thus, we believe that the Technical Specifications should be changed to allow only eight hours operation before shutting down with two AFW pumps inoperable. The attached Technical Specifications have been changed accordingly.

It is requested that CECo respond to the proposed Technical Specifications within 30 days so that we might proceed with our overall evaluation of the Zion auxiliary feedwater system.

*ASB concurrence is based on the following changes which have been agreed to by the Zion Project Manager:*  
1) Section 4.1.3 B Change: "at least two operable auxiliary feedwater pumps" to "all operable auxiliary feedwater pumps"  
2) Delete first paragraph on page 1620

Sincerely,

Steven A. Varga, Chief  
Operating Reactors Branch #1  
Division of Licensing

Enclosure:  
Technical Specifications

cc w/enclosure:

See next page

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RE 4/12/82

Mr. Louis O. DelGeorge  
Commonwealth Edison Company

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