

ATTACHMENT B

ZION NUCLEAR GENERATING STATION

**MARKED UP COPY OF
CURRENT TECHNICAL SPECIFICATIONS
FOR PROPOSED CHANGES TO
APPENDIX A TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSES
DPR-39 AND DPR-48**

EMERGENCY LICENSE AMENDMENT REQUEST 94-05

TYPE C LEAK RATE TESTING

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LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10.1.A (Continued)	<p>4.10.1.A. 6.* The retest schedules for Type A, B, and C tests shall be in accordance with the appropriate Section of 10CFR50 Appendix J.</p> <p>7. Inspection and reporting of tests shall be in accordance with the appropriate Section of 10CFR50 Appendix J.</p>

*The following exceptions apply:

- 1) Prior to startup following Z1C12 operating cycle, the Type C leak rate testing requirements of this specification are not applicable to Unit 1 penetration P-77 (valves 1PP0101, 1PP0102, 1PP0103, and 1PP0104) and Unit 2 penetration P-77 (valves 2PP0101, 2PP0102, 2PP0103, and 2PP0104).
- 2) Prior to startup following Z1C12 and Z2C12 operating cycles:
 - a) The Type C leak rate testing requirements of this specification are not applicable to Unit 1 penetration P-80 (line 1RC158-4" AA-R), and Unit 2 penetration P-80 (line 2RC158-4" AA-R); Unit 1 penetration P-76 (valve 1SI8933) and Unit 2 penetration P-76 (valve 2SI8933); Unit 1 penetration P-23 (valve 1MOV-CC9414) and Unit 2 penetration P-23 (valve 2MOV-CC9414); Unit 1 penetration P-33 (valves 1MOV-CC685 and 1MOV-CC9438) and Unit 2 penetration P-33 (valves 2MOV-CC685 and 2MOV-CC9438).
 - b) The local leak rate testing requirements of the February 29, 1980, Zion Confirmatory Order, Appendix A, Item A.3, Annex 1, Part 2, are not applicable to Unit 1 penetrations P-76 (line 1SI020-3/4" E-R) and P-80 (line 1RC158-4" AA-R), and Unit 2 penetrations P-76 (line 2SI020-3/4" E-R) and P-80 (line 2RC158-4" AA-R); Unit 1 penetration P-76 (valve 1SI8933) and Unit 2 penetration P-76 (valve 2SI8933); Unit 1 penetration P-23 (valve 1MOV-CC9414) and Unit 2 penetration P-23 (valve 2MOV-CC9414); Unit 1 penetration P-33 (valves 1MOV-CC685 and 1MOV-CC9438) and Unit 2 penetration P-33 (valves 2MOV-CC685 and 2MOV-CC9438).

REPLACE WITH
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INSERT ON PAGE 214

- 1) Prior to entering Mode 5 for refueling outage Z1R14, the Type C leak rate testing requirements of this specification are not applicable to Unit 1 valve 1MOV-CC685.
- 2) Prior to entering Mode 5 for refueling outage Z2R13, the Type C leak rate testing requirements of this specification are not applicable to Unit 2 valve 2MOV-CC685.

ATTACHMENT C

ZION NUCLEAR GENERATING STATION

**EVALUATION OF SIGNIFICANT
HAZARDS CONSIDERATIONS FOR
PROPOSED CHANGES TO
APPENDIX A TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSES
DPR-39 AND DPR-48**

EMERGENCY LICENSE AMENDMENT REQUEST 94-05

TYPE C LEAK RATE TESTING

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any previously analyzed; or
3. Involve a significant reduction in a margin of safety.

It is proposed that the footnote on page 214 of Technical Specifications be deleted and replaced with a new footnote. The new footnote will be applicable to Specification 3/4.10.1. This Specification provides the requirements for leak rate testing in accordance with the applicable sections of 10CFR50 Appendix J. The footnote that is deleted was applicable only until startup following operating cycles Z1C12 and Z2C12. The footnote that will be added provides an exception from the requirements to test in accordance with 10CFR50 Appendix J for valves 1(2)MOV-CC685 until refueling outages Z1R14 and Z2R13, during which time the valves will be Type C leak rate tested in accordance with 10CFR50 Appendix J.

1. The proposed amendment does not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated.

The subject pathway and associated containment isolation valves 1(2)MOV-CC685 and 1(2)MOV-CC9438 provide the necessary assurance to conclude that the overall containment leakage rates will remain within the limits assumed in the accident analysis. Failures in excess of design basis requirements would be necessary to adversely impact the offsite dose in the unlikely event of an accident. This conclusion can be reached since the isolation barriers of the Component Cooling Water return from the reactor coolant pumps' thermal barriers meet the following criteria:

- are of seismic design,
- are required to operate post accident (except for large break LOCA),
- the valves close automatically on Phase B isolation signal,
- are subject to Emergency Operating Procedure guidance for manual IVSW system actuation,
- are of similar design and exposed to similar environments as those penetrations that are Type C leak tested,

As such, the consequences of previously evaluated accidents, with respect to offsite dose considerations, would not be significantly impacted.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes to the Technical Specifications do not result in plant operations or configurations that could create a new or different type of accident. Installed plant equipment is not operated in a new or different manner. The proposed amendment does not add new or different types of plant equipment nor do the proposed changes alter any plant procedures used during recovery from accidents described in the analysis. As such, it can be concluded that the possibility for a new or different type of accident has not been introduced.

3. The proposed changes do not involve a significant reduction in a margin of safety.

As described in Technical Specification Bases, dose calculations suggest that the public exposure would be well below the 10CFR100 values in the event of a design basis accident.

Calculations indicate that the accident leak rate could be allowed to increase to approximately 0.148%/day before the guideline thyroid dose value given in 10CFR100 would be exceeded. However, the 0.1%/day pre-operational test acceptance criteria provides an adequate margin of safety to assure the health and safety of the public. Additional margin is achieved by establishing the allowable operational leakage rate at 0.075%/day. The as measured containment leakage rates are well within that limit. Despite the lack of Type C testing of the subject valves in strict compliance with Appendix J, substantial barriers to fission product release are provided by the intact system piping and associated valves.

Testing that has been completed on the subject valves and penetrations provides a high degree of confidence that Type C leakage limits would be met. Based on this it is concluded that the proposed changes to the Technical Specifications do not involve a significant reduction in a margin of safety.

ATTACHMENT D

ZION NUCLEAR GENERATING STATION

ENVIRONMENTAL ASSESSMENT
STATEMENT
FOR PROPOSED CHANGES TO
APPENDIX A TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSES
DPR-39 AND DPR-48

EMERGENCY LICENSE AMENDMENT REQUEST 94-05

TYPE C LEAK RATE TESTING

The proposed changes of this license amendment request have been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10CFR51.22(c)(9). The following is a discussion of how the proposed changes meet the criteria for categorical exclusion:

10CFR 51.22(c)(9): The proposed amendment involve changes to the installation or use of facility components or to Surveillance Requirements,

- (i) The proposed changes involve no significant hazards considerations (refer to the significant hazards consideration section of this license amendment request).
- (ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, since the proposed changes do not affect the generation of any radioactive effluent nor do they affect any of the permitted release paths.
- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Based on the aforementioned and pursuant to 10CFR51.22(b), no environmental assessment or environmental impact statement need be prepared in connection with issuance of a license amendment incorporating these proposed changes.

ATTACHMENT E

ZION NUCLEAR GENERATING STATION

CLARIFICATIONS TO JUNE 10, 1994 REQUEST
FOR ENFORCEMENT DISCRETION

As a result of CECO's continuing efforts to fully understand all technical aspects surrounding the need for this amendment and the associated Appendix J exemption request, CECO has identified information provided in the Reference request for NRR enforcement discretion which could potentially be misinterpreted and therefore warrants clarification. Specifically, the Reference submittal states in section 3.2, "The component cooling return line from the thermal barriers associated with the reactor coolant pumps is normally pressurized well above Pa.", and in section 3.7, "The component cooling (CC) system typically operates well above Pa (2.5 times Pa)." In fact, normal system operating pressure for the CC system ranges from a low of 115 psig to a high of 130 psig at the CC pump discharge ring header. However, the resultant system pressure at the location of valve 1(2)MOV-CC685 has been measured to be 20 psig with the penetration in service. With valve 1(2)MOV-CC685 closed, as per the test conditions described in section 3.7 of the reference, the backpressure condition created at valves 1(2)MOV-CC685 can be expected to result in pressures some what higher than that measured with the penetration in service.

As stated in section 3.2 of the reference, during most accidents considered in the UFSAR, the valves associated with penetration P-33 remain open and the line remains in service. It should be made clear that it is system integrity within the containment that precludes leakage into the CC system during an accident, not CC system pressure. This fact, however, is not pertinent to the issue of Type C testing of valves 1(2)MOV-CC685, which are both outside containment.

During a large piping break inside containment however, valves 1(2)MOV-CC685 and 1(2)MOV-CC9438 receive an automatic Phase B (hi-hi containment pressure) isolation signal to close. It is conditions such as this, in which the valve is required to be closed, that the valve must perform within the limits established in the Type C test requirements. The water leakage testing described in section 3.7 of the reference is provided as an additional example for establishment of a high confidence level that the expected performance of the valves will meet or exceed the Type C test requirements. The wording of section 3.7 could be interpreted to say that the water testing described was performed at a pressure of 2.5 times Pa. The actual pressure seen by 1(2)MOV-CC685 during this test is not documented. However, it can be concluded that, as a minimum, it would have been greater than 20 psig as described above.