



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

August 26, 1994

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

Subject: Zion Nuclear Station Unit 2  
Second Interval Inservice Inspection  
Program Relief Request  
NRC Docket No. 50-304

Reference: T. Simpkin letter to W. Russell dated May 26, 1994

Dear Mr. Russell:

With the Reference letter, Commonwealth Edison Company (ComEd) sought to revise the required Inservice Inspections for the upcoming refueling outage for Zion Station, Unit 2. In a conference call with members of your staff held on August 8, 1994, ComEd provided clarifying information pertaining to Relief Request IWB-15, which sought approval for alternative examinations of the Pressurizer Vessel to Support Skirt Integral Attachment Weld.

The purpose of this letter is to provide the clarifying information to ensure that the written record is complete. This information is included in the attachment to this letter.

If there are any questions or comments regarding this matter, please direct them to this office.

Sincerely,

T.W. Simpkin  
Nuclear Licensing Administrator

Attachment

cc: J.B. Martin, Regional Administrator - RIII  
C.Y. Shiraki, Project Manager - NRR  
J.D. Smith, Senior Resident Inspector - Zion

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## Attachment

Question: What is the unique weld identification?

Response: The weld identifier is COM-1-2100 Weld 10.

Question: Explain the value 700/Rem per hour in the general area when Zion measured 1.2 Rem/hr 18" away from the pressurizer.

Response: 1.2 R/hr was measured 18" from the pressurizer surge nozzle. This value was provided due to the fact that personnel would be in that area to remove the insulation.

700 mR/hr is the dose rate in the general area by the weld itself. Please note that 700mR/hr is the correct dose rate. The copy provided to the USNRC inadvertently read 700 R/hr. ComED apologizes for the typographical error.

Questions: What prevents using mechanical/remote surveillance equipment?

Response: In order to access surface area C-D to perform the code required surface examinations, the pressurizer heater connections and insulation would require removal and replacement. Zion estimated that 63 person-rem would be received by plant personnel performing this activity.

In addition, the configuration of the pressurizer skirt and the way it rests on the structure makes it difficult for physical access. The tight clearance between the skirt, the vessel, and the weld itself would make it difficult to physically maneuver the tooling needed to adequately prepare and inspect surface area C-D.