



Commonwealth Edison

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August 17, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Zion Station Units 1 and 2
Proposed Change to Facility Operating
License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

- References (a): July 16, 1980, letter from S. A. Varga to D. L. Peoples.
- (b): May 21, 1981, letter from T. R. Tramm to H. R. Denton.
- (c): January 27, 1982, letter from R. L. Spessard to Cordell Reed.
- (d): August 5, 1983, letter from E. L. Jordan to All Licensees.

Dear Mr. Denton:

Commonwealth Edison hereby requests a change to the Zion Technical Specifications regarding the Auxiliary Electric Power and Emergency Core Cooling Systems. These two areas are related due to the interdependency of the ECCS on the diesel generators and electrical distribution systems. The proposed change is intended to accomplish the following objectives:

- (1) To upgrade the Zion Technical Specifications to a level commensurate with the requirements of the Standard Technical Specifications (NUREG-0542), as requested by the NRC in Reference (a).
- (2) To clarify the intent of the Auxiliary Electric Power operability requirements, as requested by the NRC in IE Inspection Report Nos. 50-295/81-29 and 50-304/81-27 (Reference (c)).
- (3) To make revisions necessary to permit implementation of vendor and NRC recommendations (Reference (d)) regarding operability testing and preventive maintenance of diesel generators.

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The proposed change more clearly defines the limiting condition for operation in each operational mode and generally adjusts surveillance requirements to those of the Standard Technical Specifications (STS). However, the proposed change contains provisions different from the current STS in the areas of the required diesel generator test schedule, number of fast starts required, and allowable outage times. We understand that as a result of operating experience at plants conforming to R.G. 1.108 requirements, and in response to industry and ACRS recommendations, the NRC is considering the issuance of additional requirements for enhancing the reliability of diesel generators at operating plants. The proposed requirements are to include revisions to the STS that address NRC and industry concerns about frequent, fast start testing and length of allowable outage time. The proposed change to Zion's technical specifications conforms to the intent of the NRC's proposed revisions in these areas.

An additional feature of the proposed change allows an extended maintenance period for the "O" diesel generator, once per five years, when one unit is in Mode 5 or 6. Since the "O" diesel generator is shared between two units, extended maintenance periods have not been available under the present technical specifications, even during scheduled refueling outages. An extended period is necessary to perform the preventive maintenance program prescribed by the diesel generator manufacturer, Cooper Energy Services. The NRC has advocated such preventive maintenance programs in IE Information Notice 83-51.

Commonwealth Edison has determined that the proposed change involves no significant hazards consideration. Specifically, it has been determined that the proposed change does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. This determination is consistent with the examples provided in 48 FR 14871. The major portion of the proposed change consists of new specifications that provide "additional limitations, restrictions, or controls not presently included in the technical specifications," which are consistent with the STS and other regulatory positions. The provision permitting an extended maintenance period for the "O" diesel generator has the effect of temporarily reducing the degree of redundancy in the Auxiliary Electric Power System during the maintenance outage, but the benefits of the preventive maintenance program are expected to result in an enhancement of the diesel generator reliability.

The proposed technical specifications adequately address the concerns that prompted the issuance of Item B.6 of the Zion Confirmatory Order of February 29, 1980. Moreover, for the proposed technical specifications to become effective, conflicting provisions of the Order Item must be removed. Therefore, Commonwealth Edison requests that Item B.6 be rescinded upon issuance of the technical specifications.

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Since the Zion units began operation nearly ten years ago, the diesel generators have exhibited an overall reliability of approximately 98 percent. This performance reflects Commonwealth Edison's continuing commitment to achieving the highest degree of diesel generator reliability possible. In 1981, Commonwealth Edison strengthened that commitment by undertaking a comprehensive diesel generator reliability improvement program, which was based on the recommendations of the manufacturer and NUREG/CR-0660 (See Reference (b)). We believe that the proposed technical specification change is an essential element in our program for retaining and improving our present level of reliability.

Pursuant to 10 CFR 170, Commonwealth Edison has determined that the proposed amendment in a combined Class III and I amendment. As such, Commonwealth Edison has enclosed a fee remittance in the amount of \$4,400 for this amendment.

Pursuant to 10 CFR 50.91(b)(1), a copy of this application has been provided to the State of Illinois.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

One signed original and forty (40) copies of this letter and fifteen (15) copies of the Attachment (revised technical specification pages) have been provided for your use.

Please address any questions you may have regarding this matter to this office.

Very truly yours,

F. G. Lentine

F. G. Lentine
Nuclear Licensing Administrator

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cc: Zion Resident Inspector - (w/o Attachment)

SUBSCRIBED AND SWORN to
before me this 17th day
of August, 1983

Rosalia A. Puenta
Notary Public