



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 9, 1991

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Zion Station Units 1 and 2
Application for Amendment to Facility Operating
Licenses DPR-39 & DPR-48
Appendix A, Technical Specifications
NRC Docket Nos. 50-295 and 50-304

Dear Dr. Murley:

Pursuant to 10 CFR 50.90 Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses DPR-39 and DPR-48. The proposed amendment requests a change to the Technical Specifications to delete miscellaneous tables containing component lists and the associated table references. A detailed list of the affected tables is included in Attachment A. These tables are being relocated to other administratively controlled documents in accordance with the guidance of NRC Generic Letter 91-08 (GL 91-08).

As a result of CECo's plans to replace the second level undervoltage relays, a revision to table 3.4-2, "Engineered Safeguards System Instrument Numbers" is required to update the relay model number information. Rather than make the specific change to the table at this time, CECo is proposing deletion of all unnecessary tables as discussed in GL 91-08. This will eliminate the need for license amendment requests in the future if other plant changes result in changes to information currently contained in the tables. CECo plans to implement the undervoltage relay modifications during the next scheduled refueling outages for both units. The next refueling outages are scheduled to begin in March, 1992 for Unit 1 and September, 1992 for Unit 2. Therefore, CECo requests NRC approval of this amendment no later than February 28, 1992.

This proposed amendment request is subdivided as follows:

1. Attachment A provides a Description and Safety Analysis of the proposed change.
2. Attachment B includes marked-up Technical Specification pages with the requested changes indicated. Attachment B also includes typed copies of the revised Technical Specification pages.
3. Attachment C describes CECo's evaluation performed in accordance with 10 CFR 50.92(c), which confirms that no significant hazards consideration is involved.
4. Attachment D provides the Environmental Assessment.

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This proposed amendment has been reviewed and approved by both on-site and off-site review in accordance with Commonwealth Edison procedures.

Commonwealth Edison is notifying the State of Illinois of our application for amendment by transmitting a copy of this letter and its attachments to the designated State Official.

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

Please direct any questions you may have concerning this matter to this office.

Respectfully,



S.F. Stimac
Nuclear Licensing Administrator

- Attachments:
- A) Description and Safety Analysis of the Proposed Change
 - B) Marked-up Technical Specification Pages
 - C) Evaluation of Significant Hazards Consideration
 - D) Environmental Assessment

- cc:
- A. Bert Davis, Regional Administrator - RIII
 - J. D. Smith, Senior Resident Inspector - Zion
 - C. Patel, Project Manager - NRR
 - J. Hickman, Licensing Project Manager - NRR
 - Office of Nuclear Facility Safety - IDNS

State of Ill County of Cook
 Signed before me on this 9th
 of August, 19 91 by [Signature]
 Notary Public [Signature]



ATTACHMENT A
ZION NUCLEAR GENERATING STATION
DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGES
TO APPENDIX A, TECHNICAL SPECIFICATIONS OF
FACILITY OPERATING LICENSES DPR-39 AND DPR-48

I. DESCRIPTION OF PROPOSED CHANGE

This Technical Specification amendment request proposes to delete component lists reflected in the following Tables:

- 3.1-2 Reactor Protection System Instrument Numbers
- 3.4-2 Engineered Safeguards System Instrument Numbers
- 4.5-1 Containment Fan Cooler Components
- 4.6-1 Containment Spray System Components
- 4.7-2 Auxiliary Feedwater Pump System
- 4.7-3 Auxiliary Feedwater Supply System
- 4.8-1 Centrifugal Charging Pump System
- 4.8-2 Safety Injection Pump System
- 4.8-3 Residual Heat Removal Pump System
- 4.8-4 Accumulator Tanks
- 4.8-5 Component Cooling Pump System
- 4.8-6 Service Water Pump System
- 4.8-7 Hydrogen Control System
- 4.9-1 Isolation Seal Water System
- 4.9-2 Penetration Pressurization System
- 4.15-1 4160-Volt Engineered Safeguard Bus Main, Reserve and Standby Feeds
- 4.19-1 Failed Fuel Monitoring Instruments
- 4.21-2 Fire Suppression Water System

The information in these Tables will be relocated to the FSAR. Specifications 3.1.1, 3.4.1, 3.19.1, 3.19.3, 4.5.1.b.2, 4.6.1, 4.7.3, 4.8.1, 4.8.2, 4.8.3, 4.8.5, 4.8.6, 4.8.7, 4.9.1, 4.9.2, 4.15 1.D, 4.19.1, 4.19.2 and 4.21.2 are being revised to delete the references to these Tables. This amendment request is based upon the guidance of NRC Generic Letter 91-08 (GL 91-08) "Removal of Component Lists from Technical Specifications".

Changes to the Technical Specifications of Operating License Nos. DPR-39 and DPR-48 (NRC Docket Nos. 50-295 and 50-304) are noted in the annotated copy of the affected pages of the Technical Specifications (Attachment B).

II. PURPOSE OF PROPOSED CHANGE

The purpose of this Technical Specification amendment request is to delete component lists which are adequately addressed by the Technical Specification definition of OPERABILITY, the FSAR, and surveillance procedures.

III. REASON FOR PROPOSED CHANGE

The removal of tabular listings from the Technical Specifications is a line item improvement of Technical Specifications that has been identified by the industry and the NRC. NRC Generic Letter 91-08 provides guidance for removal of component lists from Technical Specifications. The removal of tabular listings is an administrative matter which will allow future changes to be made without a license amendment. This will relieve both the NRC and Commonwealth Edison Company (CECo) of an unnecessary administrative burden.

IV. JUSTIFICATION/EVALUATION FOR PROPOSED CHANGES

The OPERABILITY of the components listed in the affected tables ensures that mitigation of accident and transient events will be provided. All items currently contained in the affected tables will be removed from Technical Specifications and relocated to the FSAR. Existing surveillance procedures adequately address the information currently contained in the tables. These surveillance procedures are subject to the change control provisions specified in the Administrative Controls Section of the Technical Specifications (Section 6.2.1.G). The requirements for the components listed in the tables to be OPERABLE will remain in Technical Specifications. The action statements and surveillance requirements will also remain in Technical Specifications. Additionally, the Technical Specification definition of OPERABILITY requires the listed components be OPERABLE regardless of whether they are specified in the Technical Specifications. The relocation of these tables is an administrative matter which will allow future changes to be made without a license amendment. This will relieve both the NRC and CECo of an unnecessary administrative burden.

An evaluation in accordance with 10 CFR 50.59 will be performed for any changes to the listing of components in the FSAR and plant procedures. Those changes will only be implemented after review by the On-Site Review Committee.

References to the affected tables have been deleted in Specifications 3.1.1, 3.4.1, 3.19.1, 3.19.3, 4.5.1.b.2, 4.6.1, 4.7.3, 4.8.1, 4.8.2, 4.8.3, 4.8.5, 4.8.6, 4.8.7, 4.9.1, 4.9.2, 4.15.1.D, 4.19.1, 4.19.2 and 4.21.2. Conforming changes have also been made to the List of Tables, pages viii, ix, x, and xi. In summary, these changes are administrative in nature and are intended to update and improve the Technical Specifications; no question of safety is involved.