



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

October 15, 1991

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

Attn: Document Control Desk

Subject: Zion Station Units 1 and 2  
Inservice Testing Program for  
Pumps and Valves, Revision 9/91  
NRC Docket Nos. 50-295 and 50-304

- References:
- (a) October 2, 1989 letter from M. Richter to USNRC
  - (b) November 29, 1990 letter from D.L. Taylor to USNRC
  - (c) September 16, 1991 letter from T.K. Schuster to T.E. Murley
  - (d) December 17, 1987 letter from P.C. LeBlond to USNRC
  - (e) November 7, 1989 letter from G.E. Trzyna to USNRC
  - (f) October 1, 1990 letter from R.A. Chrzanowski to USNRC
  - (g) June 6, 1991 letter from R.J. Barrett to T.J. Kovach

Dear Dr. Murley:

Reference (a) provided a commitment from Commonwealth Edison Company (CECo) to revise the Inservice Testing (IST) Program Plan for Zion Station based upon the guidance of NRC Generic Letter 89-04, dated April 3, 1989. References (b) and (c) provided schedule changes regarding completion of this commitment. Pursuant to these commitments, CECo is transmitting the enclosed revision to the IST Program Plan for NRC review.

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11 w/PSID drawings

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The current IST Program Plan was submitted to NRC via reference (d) and supplemented via references (e) and (f). The NRC's review and safety evaluation of the current program is documented in reference (g). As noted above, the primary purpose of this revision is to incorporate the guidance of NRC Generic Letter 89-04. This revision also incorporates changes which were developed in response to reference (g) and previously transmitted to NRC via reference (c). Two relief requests included in the reference (c) submittal have been revised. Relief Request VR-12 has been revised to reflect the results of a recent review of the 10CFR50, Appendix J program and Relief Request VR-09 has been revised to replace the explanation of the time required for blowdown testing with an explanation of the time required for disassembly and inspection consistent with the proposed alternative to full flow testing.

This revision also addresses the results and recommendations of a thorough review of the IST Program which CECO recently completed. The revision includes changes made as a result of a recent containment isolation valve review, 1D reactor coolant pump seal damage, and the ongoing boric acid system modifications. Finally, the format of the Plan has been changed consistent with CECO's corporate guidance document for conduct of IST. A Revision Summary is included in the Plan.

Section 2.C of the revised Plan describes how system classifications are identified on Piping and Instrumentation Diagrams (P&ID's). This section of the plan also includes a listing of P&ID's which are being transmitted with this submittal to facilitate NRC review. "For Information Only" copies of these drawings are included only with copies of this submittal transmitted to the NRR Document Control Desk and the NRR Project Manager. Controlled copies of these drawings are maintained at Zion Station.

Reference (c) described CECO's schedule for resolving anomalies identified in reference (g) which are not addressed via this submittal. Any additional IST Program Plan revisions which may result from this activity will be transmitted to NRC as Plan revisions.

Please direct any questions regarding this matter to this office.

Respectfully,



S.F. Stimac  
Nuclear Licensing Administrator

Enclosure

cc: A. Bert Davis, Regional Administrator - RIII  
C.P. Patel, Project Manager - NRR  
J.D. Smith, Senior Resident Inspector - Zion

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