

Public

**ComEd**

ZRA980025

March 30, 1998

A. B. Beach  
Regional Administrator  
U. S. Nuclear Regulatory Commission Region III  
801 Warrenville Road  
Lisle Illinois, 60532-4351

PRIORITY ROUTING

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DRA		EIC	
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Subject: Applicable Regulations, Disposition of Commitments, and Systems Required  
Following Permanent Shutdown and Defueling of Zion Units 1 and 2  
Zion Station Units 1 and 2  
Facility Operating Licenses DPR-39 and DPR-40  
NRC Docket Nos. 50-295 and 50-304

- References:
- 1) Letter from O. D. Kingsley, ComEd, to U.S. NRC, dated February 13, 1998, Certification of Permanent Cessation of Operations
  - 2) Letter from O. D. Kingsley, ComEd, to U.S. NRC, dated March 9, 1998, Certification of Permanent Fuel Removal
  - 3) Nuclear Energy Institute guidance document dated December 19, 1995, "Guidelines for Managing NRC Commitments," Revision 2
  - 4) SECY-95-300, from J. M. Taylor, NRC Executive Director for Operations, to the NRC Commissioners, dated December 20, 1995, concerning Nuclear Energy Institute guidance document "Guidelines for Managing NRC Commitments"
  - 5) Letter from D. M. Crutchfield, NRC to J. F. Colvin, Nuclear Energy Institute, dated January 24, 1996, Endorsement of NEI's "Guidelines for Managing NRC Commitments," Revision 2

This letter addresses three issues related to the permanent shutdown and defueling of Zion Station Units 1 and 2. These issues concern changes in the applicability of certain regulations, the disposition of previous commitments, and identification of systems that are clearly not needed to support the long term storage of irradiated fuel in the spent fuel pool.

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### Changes in the Applicability of Certain Regulations

As specified by 10 CFR 50.82(a)(1), ComEd has provided References 1 and 2) certification of permanent cessation of operation and certification of permanent fuel removal at Zion Station. In accordance with rule changes published by 61 FR 39278, dated July 29, 1996, certain sections and appendices of 10 CFR 50 are not applicable to plants that have submitted these certifications. Accordingly, ComEd considers that compliance with the 10 CFR 50 sections and appendices tabulated below is no longer required for Zion Station.

Non-applicable Portion of 10 CFR 50	Title	Rendered Non- applicable by:
50.44	Standards for Combustible Gas Control Systems in Light-Water-Cooled Power Reactors	50.44(a)(3)
50.46	Acceptance Criteria For Emergency Core Cooling Systems For Light-Water Nuclear Power Reactors	50.46(a)(1)(i)
50.49	Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants	50.49(a)
50.61	Fracture Toughness Requirements For Protection Against Pressurized Thermal Shock Events	50.61(b)(1)
50.62	Requirements for Reduction of Risk from Anticipated Transients Without Scram (ATWS) Events for Light-Water-Cooled Nuclear Power Plants	50.62(a)
Appendix G	Fracture Toughness Requirements	50.60(a)
Appendix H	Reactor Vessel Material Surveillance Program Requirements	50.60(a)
Appendix J	Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors	50.54(o)
Appendix K	ECCS Evaluation Models	50.46(a)(1)(i)

The rule changes published by 61 FR 39278 also allow licensees of permanently shutdown and defueled plants to significantly reduce the scope of two programs required by 10 CFR 50. These are the Fire Protection program required by 10 CFR 50.48 and the Maintenance Rule program required by 10 CFR 50.65. ComEd is evaluating the existing Zion Station programs and may initiate changes in accordance with the requirements of 10 CFR 50.48(f) and 10 CFR 50.65(a)(1).

#### Disposition of Previous Commitments

The Zion Station commitment tracking system contains approximately 400 commitments made by ComEd to the NRC in previous correspondence. Many of these commitments may no longer be relevant with both units permanently shutdown and defueled. ComEd intends to evaluate these commitments and notify the NRC of changes to commitments in accordance with the methodology and criteria developed by the Nuclear Energy Institute, as described in Reference 3. This methodology has been determined to be acceptable by the NRC Staff as documented in References 4 and 5.

#### Structures, Systems, and Components Not Needed for Long Term Storage of Fuel

ComEd has begun identifying those systems that directly affect the safe storage and handling of nuclear fuel. Although this process has not been completed, ComEd has identified certain systems that are clearly not needed for the safe storage and handling of nuclear fuel and are not needed to support planned operation of the main generators as synchronous condensers. These systems are listed below for information. ComEd is using this list for guidance in determining work priorities and allocation of resources.

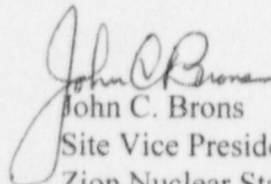
BD	Steam Generator Blowdown
CD	Condensate (except for the Condensate Storage Tank)
CR	Control Rod Motor Generators, Switchgear, and Reactor Trip Breakers
CR	Control Rods and Drives
CS	Containment Spray
DT	Reactor Coolant Drain
EH	Turbine EHC
ES	Extraction Steam
FS	Feedwater Turbine Supervisory
FW	Auxiliary Feedwater
FW	Main Feedwater
HD	Heater Drain
HM	Miscellaneous Heater Drains
HR	Moisture Separator/Reheaters
IC	Incore Systems
IW	Isolation Seal Water



LL	Loose Parts Monitoring
MS	Main Steam
NR	Nuclear Instrumentation
PP	Penetration Pressurization
RC	Reactor Coolant
RH	Residual Heat Removal
RP	Reactor Protection
RV	Hydrogen Monitors
SI	Safety Injection
TC	Thermocouples (Reactor)

Attached is a listing of the commitments contained in this submittal. Please direct any questions you may have concerning this submittal to this office.

Respectfully,

  
John C. Brons  
Site Vice President  
Zion Nuclear Station

Attachments

cc: NRC Document Control Desk – Washington DC  
Zion Station Project Manager - NRR  
Senior Resident Inspector - Zion Station  
Office of Nuclear Facility Safety - IDNS  
IDNS Resident Inspector

**List of Commitments Identified in ZRA980025**

The following table identifies those actions committed to by ComEd in this document. Any other actions discussed in this submittal represent intended or planned actions by ComEd. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify Mr. Robert Godley, Zion Station Regulatory Assurance Manager, of any questions regarding this document or any associated regulatory commitments.

<b>Commitment</b>	<b>Committed Date</b>
ComEd will comply with the provisions of 10 CFR 50.48(f) and 10 CRFR 50.65(a)(1) for changes to the Fire Protection program and the Maintenance Rule program to reflect the permanently shutdown and defueled condition of the plant.	No specific date.
ComEd will evaluate commitments made to the NRC in previous correspondence and notify the NRC of changes in accordance with the methodology and criteria described in Nuclear Energy Institute document "Guidelines for Managing NRC Commitments," Revision 2, dated December 19, 1995.	No specific date.