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May 10, 1989

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Station PI-137
Washington, DC 20555

Subject: Zion Nuclear Power Station, Units 1 and 2
License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304
Proposed Amendment to Technical Specifications
Sections 3.1 and 4.1, "Reactor Protection System"

Reference: April 17, 1989 letter from G.E. Trzyna to US NRC

Gentlemen:

The original request for a proposed amendment to Sections 3.1 and 4.1 of the Technical Specifications for Zion Station was submitted on April 17, 1989. Subsequent to the original submittal, additional discussions between Commonwealth Edison and NRC personnel have indicated that some minor clarifications to the original submittal would be required. The purpose of this letter is to provide the appropriate revisions to the proposed amendment.

A summary of the changes is provided below:

- 1) Table 3.1-1, page 30 and 31, Table Heading, Column 5
This change removed the (+) footnote from the heading of Column 5 and applied it to the individual line items as appropriate. This change was necessary because the (+) footnote would not apply to Line Item 22, an addition to the Table.
- 2) Table 3.1-1, page 31 Line 17
This change clarified the wording of the "Setpoint" to make it consistent with Standardized Tech Specs.
- 3) Table 3.1-1, page 31 Line 18
This change clarified the wording of the "Setpoint" to make it consistent with Standardized Tech Specs.
- 4) Table 3.1-1, page 31, Line 21
This change distinguished the Automatic Reactor Trip Logic and the Reactor Trip Breakers as two separate line items.

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Also, the (#) footnote has been changed to read, "During Modes 3,4 or 5 and with the Reactor Trip System breakers closed and the Control Rod Drive System capable of rod withdrawal, the following applies: With the number of OPERABLE channels one less than the minimum OPERABLE channels requirement, restore the inoperable channel to OPERABLE status within 48 hours or open the Reactor Breakers within the next hour." These words are consistent with the requirements of Generic Letter 85-09.

5) Table 3.1-1, page 31, Line 22

This change incorporates "Reactor Trip Breakers" as a separate line item in the table. Also, a new (##) footnote has been added to read, "During Modes 1 or 2, with one of the diverse trip features (Undervoltage or Shunt Trip Attachment) inoperable, restore it to OPERABLE status within 48 hours or declare the breaker inoperable and maintain or proceed to Hot shutdown within four hours if the unacceptable condition arises during power operation. The breaker shall not be bypassed while one of the diverse trip features is inoperable except for the time required for performing maintenance and testing to restore the breaker to OPERABLE status. The words are consistent with the requirements of Generic Letter 85-09.

6) Table 3.1-1, page 32

This change addresses the (+++) footnote to change the allowable outage time from 2 hours to 8 hours. This time period was discussed with NRC personnel, and is consistent with other facilities that have similar vintage reactor protection circuitry.

7) Table 3.1-1, page 32

This change added (#and##) footnotes to the table.

8) Table 4.1-1, page 35, Line 1

This change provides a clarification of the last sentence of the Remarks column to indicate that the appropriate test shall apply to the Reactor Trip Bypass Breakers.

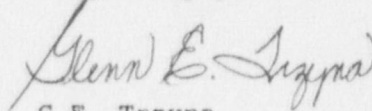
Attachment 1 contains the revised pages of the Technical Specifications. Attachment 2 contains a significant hazards review which demonstrates that the proposed changes are of minor significance, and are consistent with the guidance of Generic Letter 85-09, and consequently warrant consideration as no significant hazards.

Some of the changes contained in this amendment will require Zion Station to perform routine surveillances on a refueling frequency to components of reactor protection circuitry that were not previously required to be tested. The item of specific concern is the refueling surveillance associated with item 23 of Table 4.1-1. In order to accomplish the new test requirements, procedure revisions will be required. Commonwealth Edison will attempt to expedite these revisions, however, these procedures may not be available for use during the Fall, 1989 Unit 1 refueling outage. Therefore, Commonwealth Edison requests that consideration be given to delay the requirement for testing until the first refueling outage for each unit after January 1, 1990.

As provided by 10CFR 50.91, the State of Illinois is being notified of this amendment request by transmittal of this letter and attachments.

Please direct any questions that you may have to this office.

Very truly yours,

A handwritten signature in cursive script, reading "Glenn E. Trzyna".

G.E. Trzyna
Nuclear Licensing Administrator

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cc: Chandu Patel - NRR
NRC Resident Inspector - Zion
M.C. Parker - IDNS

ATTACHMENT 1

ZION NUCLEAR POWER STATION

PROPOSED AMENDMENT TO
TECHNICAL SPECIFICATIONS
SECTIONS 3.1 AND 4.1

PAGE(S) MODIFIED

30

31

32

35

PAGE(S) ADDED

NONE

PAGE(S) DELETED

NONE