



December 17, 1996

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Zion Station Units 1 and 2
Commitment Regarding PTLR Methodology
Operating Licenses DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

Reference: a) Letter from R. P. Tuetken, Commonwealth Edison, to U.S.
Nuclear Regulatory Commission, dated July 26, 1996, -
Application for Amendment to Facility Operating Licenses DPR-
39 and DPR-48

b) Letter from J. H. Mueller, Commonwealth Edison, to U.S.
Nuclear Regulatory Commission, dated October 14, 1996, -
Response to an NRC Request for Additional Information

This letter documents Commonwealth Edison's (ComEd's) commitment to modify the methodology described in the Zion Pressure-Temperature Limits Report (PTLR) for applying data from Point Beach Unit 2 reactor vessel irradiation capsules to the Zion reactors.

ComEd previously submitted, in Reference (a), a request to amend the Zion Station Technical Specifications. The proposed amendment would remove the requirements governing reactor coolant system pressure and temperature limits for heatup, cooldown, low temperature operation, and hydrostatic testing from the Technical Specifications. Such requirements would be governed by a ComEd controlled PTLR.

In Reference (b), ComEd provided justification for applying surveillance data from Point Beach Unit 2 reactor capsules to the Zion reactors for weld metal WF-154, including justification that the effect of a 13°F temperature difference in irradiation temperature between Point Beach Unit 2 and Zion was insignificant.

ComEd also noted that, even if a margin of 1°F per °F of difference in irradiation temperature were applied to the calculated chemistry factor, weld metal WF-154 would not be limiting, and there would be no impact on the previously proposed pressure-temperature limits or Low Temperature Overpressure Protection setpoints.

9612240001 961217
PDR ADOCK 05000295
P PDR

AC0011/D

In subsequent discussions, the NRC Staff has stated that it considers that a margin of 1°F per °F of difference must be applied to account for the difference in irradiation temperature between the Point Beach Unit 2 capsule and the Zion reactors, and has indicated that the methodology described in the PTLR must be revised accordingly.

Although ComEd considers the PTLR methodology as described in Reference (a) and as justified in Reference (b) to be valid, ComEd will revise the PTLR methodology such that a margin of 1°F per °F of difference will be applied to account for the difference between the irradiation temperature of the Point Beach Unit 2 capsule and the irradiation temperature of the Zion reactors.

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

Respectfully,

A handwritten signature in dark ink, appearing to read 'J. H. Mueller', with a long horizontal flourish extending to the right.

J. H. Mueller
Site Vice President
Zion Station

cc: NRC Regional Administrator - RIII
Zion Station Project Manager - NRR
Senior Resident Inspector - Zion Station
Office of Nuclear Facility Safety - IDNS
IDNS Resident Inspector
Zion NLA
Reg. Assurance File
DCD Licensing