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Zion Generating Station
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November 6, 1996

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

Subject: Zion Station Units 1 and 2
Additional Information Regarding
Proposed License Amendment
Operating Licenses DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

Reference: Letter from J. H. Muller, Commonwealth Edison, to U.S. Nuclear Regulatory Commission, dated October 4, 1996 - Application for Amendment to Facility Operating Licenses DPR-39 and DPR-48.

This letter provides additional information regarding a previously proposed license amendment that would explicitly define the modes of applicability for Rod Position Indicator Channel operability requirements.

In the referenced letter, Commonwealth Edison (ComEd) proposed amending the Zion Station Operating Licenses to add an applicability statement to Technical Specification 3.2.3.D, "Inoperable Rod Position Indicator Channels," such that the operability requirements of the specification would be applicable in Modes 1 and 2. The purpose of this amendment was to clearly allow closing the reactor trip breakers with the plant in Mode 3, and with multiple channels of the rod position indicator (RPI) system inoperable. This allowance is needed so that the inoperable channels may be realigned and restored to operability.

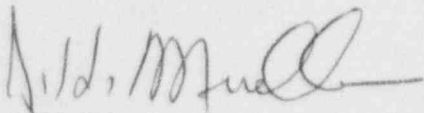
In response to discussions with NRC staff, ComEd is providing the following additional information. An amendment was not previously requested because personnel had been utilizing the specification bases to resolve the conflicting requirements within the specification. However, the increased emphasis by station management on literal compliance with written requirements, the recent development of station guidance for determining applicability requirements, and a close examination of the RPI operability requirements (as a result of the complete upgrade of the Unit 2 RPI system), led to the determination that a Technical Specification amendment was needed. Accordingly, ComEd submitted the referenced amendment request.

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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 stylized, flowing script.

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