

February 23, 2000

Mr. Oliver D. Kingsley, President  
Nuclear Generation Group  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: BYRON - COMPLETION OF LICENSING ACTION FOR GENERIC LETTER  
98-02 (TAC NOS. MA4774 AND MA4775)

Dear Mr. Kingsley:

On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02, "Loss of Reactor Coolant Inventory and Associated Potential for Loss of Emergency Mitigation Functions While in a Shutdown Condition," to all holders of operating licenses for Pressurized Water Reactors (PWR), except those who have permanently ceased operations, and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event, which occurred at Wolf Creek, which had the potential to drain down the reactor coolant system to the refueling water storage tank and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2), if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes which would prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

In response to GL 98-02, Commonwealth Edison Company (ComEd) provided a letter dated November 24, 1998, for Byron Station, Units 1 and 2 (Byron). The submittal indicated that Byron was vulnerable to the type of incident which occurred at Wolf Creek and further indicated that the plant evaluation concerning the subject vulnerability (information item (2) of GL 98-02), was being kept in a retrievable licensee system that the NRC could verify on an as-needed or sample basis, in accordance with GL 98-02.

By letter dated December 21, 1999, the NRC Region III staff issued NRC Inspection Report Nos. 50-454/99-19; 50-455/99-19 which contained a summary of the NRC staff's on-site verification of activities which ComEd undertook in response to GL 98-02 for Byron. Specifically, the inspectors verified that administrative controls, configuration management, and operating procedures to preclude an inadvertent draindown event as described in GL 98-02 were effectively implemented. The residual heat removal system (RH) recirculation to refueling water storage tank manual isolation valves (valves 1/2RH8735) were identified as points of

vulnerability. The inspectors noted that the valves were maintained as locked closed and that operation of the valves was controlled by procedures. In addition, the procedures required that an operator be stationed by the valves whenever they are opened. The inspectors verified that these valves were accessible and that they were locked closed. ComEd's corrective actions for this issue included the following: (1) placing limitations on the use of the valves while the RH system is in the shutdown cooling mode; (2) implementing appropriate procedure modifications; (3) requiring an operator to be present at the manual recirculation valve any time the valves are open; (4) presenting and discussing the events in the operator training program; and (5) using high level awareness briefings for greater operator awareness for this type of evolution.

Based on the review of ComEd's response to GL 98-02 and the results of the on-site inspection of the corrective actions, the NRC staff has concluded that; (1) all of the information requested by GL 98-02 has been provided, and (2) that the on-site activities adequately addressed the concerns of GL 98-02. Therefore, we consider GL 98-02 to be closed for Byron Station, Units 1 and 2.

Sincerely,

*/RA/*

George F. Dick, Jr., Sr. Project Manager, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454 and STN 50-455

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O. Kingsley  
Commonwealth Edison Company

Byron Station  
Units 1 and 2

cc:

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

Chairman, Ogle County Board  
Post Office Box 357  
Oregon, Illinois 61061

Illinois Department of Nuclear Safety  
Office of Nuclear Facility Safety  
1035 Outer Park Drive  
Springfield, Illinois 62704

Mrs. Phillip B. Johnson  
1907 Stratford Lane  
Rockford, Illinois 61107

Document Control Desk-Licensing  
Commonwealth Edison Company  
1400 Opus Place, Suite 400  
Downers Grove, Illinois 60515

Attorney General  
500 S. Second Street  
Springfield, Illinois 62701

Ms. C. Sue Hauser, Project Manager  
Westinghouse Electric Corporation  
Energy Systems Business Unit  
Post Office Box 355  
Pittsburgh, Pennsylvania 15230

Commonwealth Edison Company  
Byron Station Manager  
4450 N. German Church Road  
Byron, Illinois 61010-9794

Joseph Gallo  
Gallo & Ross  
1025 Connecticut Ave., N.W., Suite 1014  
Washington, DC 20036

Commonwealth Edison Company  
Site Vice President - Byron  
4450 N. German Church Road  
Byron, Illinois 61010-9794

Howard A. Learner  
Environmental Law and Policy  
Center of the Midwest  
35 East Wacker Drive  
Suite 1300  
Chicago, Illinois 60601-2110

Mr. David Helwig  
Senior Vice President  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 900  
Downers Grove, Illinois 60515

U.S. Nuclear Regulatory Commission  
Byron Resident Inspectors Office  
4448 North German Church Road  
Byron, Illinois 61010-9750

Mr. Gene H. Stanley  
Vice President - Nuclear Operations  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 900  
Downers Grove, Illinois 60515

Ms. Lorraine Creek  
RR 1, Box 182  
Manteno, Illinois 60950

Mr. Christopher Crane  
Senior VP - Nuclear Operations  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 900  
Downers Grove, Illinois 60515

O. Kingsley  
Commonwealth Edison Company

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Byron Station  
Units 1 and 2

Mr. R. M. Krich  
Vice President - Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, Illinois 60515

Commonwealth Edison Company  
Reg. Assurance Supervisor - Byron  
4450 N. German Church Road  
Byron, Illinois 61010-9794

Ms. Pamela B. Stroebel  
Senior Vice President and General Counsel  
Commonwealth Edison Company  
P.O. Box 767  
Chicago, Illinois 60690-0767