

Commonwealth Edison Company
Byron Generating Station
4450 North German Church Road
Byron, IL 61010-9794
Tel 815-234-5441



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United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Subject: Regulatory Commitment Change Summary Report

Please find enclosed the "Regulatory Commitment Change Summary Report" for Byron Station.

This report contains summary information from January 1, 1999, through December 31, 1999. Revisions to docketed regulatory commitments were processed using Nuclear Energy Institute's (NEI's) guidance for Managing Nuclear Regulatory Commission (NRC) Commitments, Revision 2, dated December 19, 1995.

If you have any questions concerning this letter, please contact Mr. B. J. Adams at (815) 234-5441, extension 2280.

Respectfully,

A handwritten signature in black ink, appearing to read "William Levis", is written over a horizontal line.

William Levis
Site Vice President
Byron Station

WL/CB/dpk

Attachment

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Byron Station

A001

**Attachment
Byron Station
Regulatory Commitment Change Summary Report**

In general, the basis for all the commitment changes described below is the standardization of procedures at all Commonwealth Edison (ComEd) Company Nuclear Stations. To obtain consistency, all station procedures are written to standards and expectations consistent with safe, conservative operations. The commitments being eliminated are generally administrative in nature and remain part of station procedures that address specific actions for Byron Station. Therefore, it was determined that continued, independent administrative tracking of these items as formal commitments is no longer necessary. These items remain proceduralized, and are considered the current standard practice for Operations at all ComEd Nuclear Stations.

Original Document: LER 88-002

Subject of Change:

This commitment was made to ensure review of information by the Nuclear Station Operator during the turnover process. This commitment was deleted.

Basis:

This commitment was made in 1988. Current procedures rigidly control the turnover process and requirements. This practice has become fully standardized. Byron Station standards for procedure usage direct the use of procedures. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

The commitment was deleted through Commitment Change Identification Numbers 99-040 and 99-041.

Original Document: LER 88-008

Subject of Change:

This commitment was to add a procedural step to discuss information regarding the Operating units with an Operating Engineer. This commitment was deleted.

Basis:

This commitment was made in 1988. This procedural requirement remains for the Shift Manager to discuss plant status with Operations Management. This has become standard turnover practice for Operations. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

This commitment was deleted through Commitment Change Identification Numbers 99-042 and 99-043.

Original Document: LER 87-19

Subject of Change:

This commitment required clarification of steps in the General Operating Procedures (BGPs) for Turbine Control with the Digital Electric Hydraulic (DEH) system. The clarification was regarding the use of turbine manual operations. The steps remain in place. The commitment was deleted.

Basis:

This commitment was made in 1987. The procedure steps remain in place. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

This commitment was deleted through Commitment Change Identification Number 99-044.

Original Document: LER 87-16

Subject of Change:

This commitment was to check the status of locked valves by adding a separate item on the Shift Manager's Turnover Sheet. This commitment was deleted.

Basis:

This commitment was made in 1987. The procedure steps remain in place. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

This commitment was deleted through Commitment Change Identification Numbers 99-045 and 99-046.

Original Document: LER 90-10

Subject of Change:

This commitment was to verify the status of the Anticipated Transient Without Scram (ATWS) Mitigation System (AMS) on a shiftly basis. This commitment was deleted.

Basis:

This commitment was made in 1990. The equipment is verified on a shiftly basis as part of routine operator rounds and surveillances. This requirement is maintained in procedures. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

This commitment was deleted through Commitment Change Identification Number 99-047 and 99-048.

Original Document: LER 85-028 and 85-063

Subject of Change:

This commitment clarified permissive setpoints for P-7, P-10, and P-13 in procedures. Specifically, verify that P-7 illuminates when both P-10 and P-13 are lit, not either. This commitment was deleted.

Basis:

This commitment was made in 1988. The requirements and setpoints for the permissives are clearly defined in the BGPs and the Byron Alarm Response (BARs) procedures. Procedures clearly describe information, such as Permissives and corresponding setpoints, to Operations personnel. Procedure Writers' Guides were used to standardize the information. Therefore, it was determined that there is no benefit to administratively tracking this item as a commitment.

Status:

This commitment was deleted through Commitment Change Identification Number 99-049.

Original Document: LER 87-19

Subject of Change:

This commitment was to delineate how switching operations in the 345 KV Switchyard would be performed. This commitment was deleted.

Basis:

This commitment was made in 1987. Switching operations are controlled with procedures containing the standards necessary to perform these activities. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

This commitment was deleted through Commitment Change Identification Number 99-050.

Original Document: LER 94-015-01

Subject of Change:

This commitment was used to define manpower and turnover requirements. This commitment was deleted.

Basis:

This commitment was made in 1994. Manpower requirements and need for turnover information is proceduralized. These procedures clearly define the requirements and standards. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

This commitment was deleted through Commitment Change Identification Number 99-051.

Original Document: Commitment 4542518821400

Subject of Change:

This commitment is for manpower assignments during abnormal plant conditions. This commitment was deleted.

Basis:

These requirements are proceduralized and contained within the Generating Station Emergency Plan (GSEP). With manpower assignments clearly defined in implementing procedures for the GSEP, it was determined that administrative tracking of this commitment was unnecessary.

Status:

This commitment was deleted through Commitment Change Identification Number 99-052.

Original Document: Root Cause Report 454-200-91-07700

Subject of Change:

This commitment was to ensure mode changes and all respective paperwork was complete and communicated to control room personnel prior to taking any actions to change plant operating modes. This commitment was deleted.

Basis:

This commitment was made in 1991. All requirements for mode changes are clearly delineated. Numerous procedures are used to prepare for and control mode changes. This standard is rigidly enforced as described in these procedures. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

This commitment was deleted through Commitment Change Identification Numbers 99-053, 99-054, 99-055, and 99-056.

Original Document: Root Cause Report 455-200-93-00400

Subject of Change:

This commitment was to verify locked equipment status with the status of the safety trains during the turnover process. This commitment was deleted.

Basis:

This commitment was made in 1993. The requirements of this commitment remain a part of procedures for control of the locked equipment program as well as turnovers. This information is a standard of review for all turnovers. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

This commitment was deleted through Commitment Change Identification Number 99-057.

Original Document: LER 90-07

Subject of Change:

This commitment was to provide review participants with guidelines on how to perform reviews. This commitment was deleted.

Basis:

This commitment was made in 1990. The requirements for reviews are delineated in the procedures for qualification of the reviewers. Additional guidelines are not necessary. This commitment has been proceduralized for a long period of time and has become the standard for power plant operations.

Status:

This commitment was deleted through Commitment Change Identification Number 99-076.