

July 3, 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: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE REVIEW OF
THE BEACON CORE MONITORING & SUPPORT SYSTEM, BYRON
STATION, UNITS 1 AND 2, AND BRAIDWOOD STATION, UNITS 1 AND 2
(TAC NOS. MA8254, MA8255, MA8252, AND MA8253)

Dear Mr. Kingsley:

By letter dated February 15, 2000, Commonwealth Edison Company requested a license amendment to implement the Best Estimate Analyzer for Core Operations Nuclear Power Distribution System at Byron and Braidwood.

During the initial review of the above request, we have determined that additional information is required in order for us to complete our review. Please provide the information requested in the enclosed Request for Additional Information (RAI). The questions were discussed with members of your staff during a telephone conference on June 19, 2000. Based on the discussions between the two staffs, we request a response to the RAI within 30 days of receipt of this letter.

Sincerely,

/RA Stewart Bailey for/

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

Docket Nos. STN 50-454, STN 50-455,
STN 50-456, and STN 50-457

Enclosure: RAI

cc w/encl: See next page

O. Kingsley
Commonwealth Edison Company

Byron/Braidwood Stations

80

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- 2 -

Byron/Braidwood Stations

88

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July 3, 2000

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Sincerely,
/RA Stewart Bailey for/
George F. Dick, Jr., Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455,
STN 50-456, and STN 50-457

Enclosure: RAI

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
RELATED TO THE REVIEW OF
THE BEACON CORE MONITORING & SUPPORT SYSTEM
BYRON STATION, UNITS 1 AND 2
BRAIDWOOD STATION, UNITS 1 AND 2
DOCKET NOS. STN 50-454, STN 50-455, STN 50-456, AND STN 50-457

Please provide information requested in the following:

1. On page A-11, the statement is made that “—margins far exceed the actual operational requirements.” Please elaborate on this statement.
2. On page A-12, The last sentence of the second paragraph and the first sentence of the third paragraph seem to contradict each other. Please provide clarification. Demonstrate how the conditions in the SER for BEACON are met.
3. On Page A-23, the last sentence of the third paragraph states that “—or when significant changes occur.” Please provide the meaning of the phrase “—or when significant changes occur.”
4. On page A-24, the second paragraph from the bottom makes reference to comparing BEACON to actual cycle specific parameters. What constitutes acceptable criteria for the comparison between BEACON predictions and the actual cycle data?
5. On page A-26, in the second to the last paragraph from the bottom the subject of “inoperable AFD bands” is mentioned. Please provide examples of these bands.
6. The Power Distribution Monitoring System (PDMS) is not considered to meet any of the 10 CFR 50.36(c)(2)(ii) selection criteria for inclusion into the Technical Specifications (TS). There is not a proposed PDMS TS or a PDMS Technical Requirements Manual (TRM) TLCO. The BEACON topical report (WCAP-12472-P-A) proposed TS changes present the BEACON system as included in the draft TS since they meet criterion 2 of 10 CFR 50.36(c)(2)(ii). How does the PDMS differ from the BEACON system presented in WCAP-12472-P-A; why is a related specification not in the TS?
7. The proposed PDMS Instrumentation Functions do not include a pressurizer pressure requirement. However, the proposed BEACON Instrumentation Functions do include a pressurizer pressure requirement. Please explain the difference.
8. TS 3.1.4, Required Action B.4 and B.5 have been combined into one action which states that the hot channel factors are to be determined, rather than the specific surveillance requirements to be performed. The current TS method of presentation is preferred, and is also consistent with the new generic standard technical specifications (STS). The staff recognizes that there will be surveillance options for when PDMS is operable or

ENCLOSURE

inoperable, and that conveying the options in the Required Actions statements would get involved. Reverting to a description of the SR to be performed rather than specifying the exact SR number to be performed is acceptable as long as the Bases are updated to explain the SR options explicitly by number, so there is no confusion over what is required.

9. In TS 3.2.1, Required Actions A.4 and B.4, requiring the performance of surveillances prior to exceeding a power level, have been deleted. Both the STS and the Byron and Braidwood current TS have these requirements. The staff suggests retaining these Required Actions, with a note included stating, "Only required to be performed when PDMS is inoperable."
10. A note (2) has been proposed to be added to both SR 3.2.1.1 and SR 3.2.1.2 stating that the SR is, "Not required to be performed until 12 hours after declaring PDMS inoperable. Performance of SR 3.2.1.3/4 satisfies the initial performance of this SR after declaring PDMS inoperable." The second sentence of this note is unnecessary, and could lead to confusion over what is the initial performance of the SR. The staff recommends deleting the second sentence or rewording it to avoid potential confusion. A possible rewording might be: "Not required to be performed until 12 hours after declaring PDMS inoperable; if SR 3.2.1.3/4 had been performed within its required frequency prior to declaring PDMS inoperable."
11. TS 3.2.2, Required Actions A.2 and A.4 state that the Nuclear Enthalpy Rise Hot Channel Factor is to be determined, rather than refer to a specific surveillance requirement number to be performed. The current TS method of presentation is preferred; it is also consistent with the STS. The staff recognizes that there are now surveillance options for when PDMS is operable or inoperable, and that conveying the options in the Required Actions statements could get involved. Reverting to a description of the SR to be performed rather than specify the exact SR number to be performed is acceptable as long as the Bases are updated to explain the SR options explicitly by number, so there is no confusion over what is required.
12. A note has been proposed to be added to SR 3.2.2.1 stating that the SR is, "Not required to be performed until 12 hours after declaring PDMS inoperable. Performance of SR 3.2.2.2 satisfies the initial performance of this SR after declaring PDMS inoperable." The second sentence of this note is unnecessary, and could lead to confusion over what is the initial performance of the SR. The staff recommends either deleting the second sentence or rewording it to avoid potential confusion. A possible rewording might be: "Not required to be performed until 12 hours after declaring PDMS inoperable; if SR 3.2.1.3/4 had been performed within its required frequency prior to declaring PDMS inoperable."