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United States Nuclear Regulatory Commission
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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: Withdrawal of Licensee Event Report (LER) 454 98-001-00

Reference: LER 454-98-001-00, "Failure to Test Logic Circuit due to Oversight by Initial Technical Specification Reviewers," dated February 25, 1998.

Based on re-consideration of the applicability of the 10 CFR 50.73, "Licensing Event Report System," requirements as discussed below, we are withdrawing the referenced LER.

The Technical Specifications for Byron Station requires the surveillance of the Engineered Safety Feature automatic actuation logic and actuation relays. One of the surveillance requirements is a slave relay test on a quarterly frequency. A slave relay test requires, in part, a continuity check of associated testable actuation devices. The associated testable actuation devices are not explicitly defined in Technical Specifications.

On February 2, 1998, Byron Station Engineering personnel discovered what they believed to be a portion of an electrical circuit associated with slave relay K608 for which continuity checks were not performed. Believing at the time that this particular portion of the circuit fell under the Technical Specification slave relay requirement, we concluded the condition was reportable to the NRC in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications. Accordingly, the referenced LER was submitted. Upon further review, Engineering personnel determined that the continuity check of this particular circuit is not required to satisfy the Technical Specification quarterly slave relay surveillance for slave relay K608.

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The questionable portion of the circuit involved three contacts that energize a Safeguard Actuation Relay (SAR) while a safety related 4KV bus is powered by its reserve feed (i.e., crosstied to the opposite unit). The SAR relay is installed in the automatic actuation circuitry to allow block starting of Emergency Core Cooling System (ECCS) loads upon receipt of a safety injection signal without a loss of offsite power. When there is a loss of offsite power situation, another automatic actuation logic exists that will sequence the ECCS loads on the diesel generator that is powering the 4KV bus. Block loading is desirable, when offsite power is available, since ECCS water will reach the core sooner. However, the sequencer portion of the circuit is active and will function both with and without offsite power available.

All design basis accident analyses were satisfied by conservatively assuming that the ECCS loads will always be sequenced onto the 4KV bus regardless whether offsite power is available or not. Consequently, the block start of ECCS loads via the SAR relay provides a desirable time margin if offsite power is available but it is not a necessary feature to ensure the accident analysis assumptions are preserved. In addition, the failure modes of the contacts and SAR relay were reviewed to ensure that a failure of any of these components would not interfere with the credited sequencing function. It was determined that no credible failures of the contacts or SAR relay would inhibit the sequencing function.

The sequencing portion of the automatic actuation circuitry is included in the quarterly slave relay test. The block load start feature for ECCS equipment is an important design feature and will continue to be tested on a periodic basis; however, this design feature is not required to be tested as part of the Technical Specification slave relay quarterly surveillance for slave relay K608. Failing to test this particular circuit was not a condition prohibited by Technical Specifications and consequently not a 10 CFR 50.73(a)(2)(i)(B) reportable event.

Should you have any questions concerning this letter, please contact Mr. Brad Adams, Regulatory Assurance Manager, at (815) 234-5441, extension 2280.

Respectfully,



William Levis
Site Vice-President
Byron Station

WL/JL/dpk

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