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Nuclear

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Washington, DC 20555-0001

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

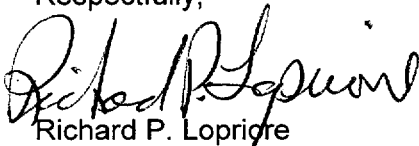
Subject: Regulatory Commitment Change Summary Report

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

This report contains summary information from January 1, 2000, through December 31, 2000. Revisions to docketed regulatory commitments were processed using Nuclear Energy Institute's (NEI's) Guideline for Managing Nuclear Regulatory Commission (NRC) Commitments, Revision 2, dated December 19, 1995.

If you have any questions concerning this letter, please contact P. Reister, Regulatory Assurance Manager, at (815) 234-5441, extension 2280.

Respectfully,



Richard P. Lopriore
Site Vice President
Byron Nuclear Generating Station

RPL/GWS/dpk

Attachment

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

A001

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

Original Document: Commitments 4542519004400 and 4542519004300 (NRC Generic Letter 89-04 Guidance)

Subject of Change:

These commitments were made to revise American Society of Mechanical Engineers (ASME) pump and valve administrative procedures to comply with NRC Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," specifically, to include instructions on use of reference valve stroke times for power operated valves and check valve full flow testing requirements. These commitments were deleted.

Basis:

These commitments were made in 1990 and the intent of the commitments continues to be met. The ASME code clearly contains the requirements to utilize reference stroke times for power-operated valves and full flow testing requirements for check valves. Guidance has been provided in our procedures for a long period of time and continues to be provided to address valve-testing issues per ASME code requirements. Pump performance reference values establishment is clearly embodied in the ASME code. Guidance has been provided in our procedures for a long period of time to address establishment of pump performance reference values, per ASME code requirements.

Status:

These commitments were deleted through Commitment Change Identification Numbers 00-003 and 00-033.

Original Document: Commitment 4542518837500 (NRC Information Notice 87-38, "Inadequate or Inadvertent Blocking of Valve Movement," Recommendation)

Subject of Change:

This commitment was made to provide instructions in the procedure addressing equipment out-of-service to address steps necessary to initiate, hang, and clear equipment out-of-service. The instructions addressed if a device fails to a position different than the out-of-service position, it should be held in the out-of-service position by a mechanical block or other appropriate method. This was done to comply with guidance provided in NRC Information Notice 87-38, recommendation #3. This commitment was deleted.

Basis:

This commitment was made in 1988 and the intent of the commitment continues to be met. The current procedure addressing equipment out-of-service contains detailed guidance including use of blocking devices. This is a well-established standard practice.

Status:

This commitment was deleted through Commitment Change Identification Number 00-13.

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Original Document: Commitments 4542518726200 and 4542518705500 (NRC Enforcement Conference 07/09/87)

Subject of Change:

These commitments added wording in the Station equipment out-of-service procedure and the Station Action/Work Request processing procedure to verify the redundant train of equipment is operable before proceeding and to review existing Limiting Conditions for Operation Action Requirements (LCOARs) on the opposite train before authorizing work to proceed, respectively. These commitments were deleted.

Basis:

These commitments were made in 1987 and the intent of the commitments continues to be met. Current procedures addressing Station equipment out-of-service and work execution and closeout contain guidance on checking for redundant operable equipment and shift authorization prior to starting work. This is a well-established standard practice. This commitment deletion does not change actual practice.

Status:

These commitments were deleted through Commitment Change Identification Numbers 00-016 and 00-065.

Original Document: June 14, 1984 letter from D. L. Farrar (ComEd) to H. R. Denton (NRR), "LaSalle County Station Units 1 and 2 Appeal of Certain Fire Protection Positions"

Subject of Change:

This commitment stated that annual training provided to individuals assigned to perform fire watch activities for hot work (i.e. cutting and welding) would include practice in extinguishing a small class B test fire. This commitment was revised to exempt participants in the annual hot work fire watch refresher educational class from extinguishing a small fire provided they have previously participated in a hands-on practice session that included extinguishing a test fire with a portable extinguisher.

Basis:

This commitment was made in 1984. The revised commitment satisfies National Fire Protection Association (NFPA) 51B, "Fire Prevention in Use of Cutting and Welding Processes," and applicable Occupational Safety and Health Administration (OSHA) educational and training requirements. Therefore, reasonable assurance is provided that a fire-watch will be able to extinguish incipient stage hot work fires. The revised commitment preserves compliance.

Status:

This commitment was revised through Commitment Change Identification Number 00-024.

Original Document: Commitment 454230930040006

Subject of Change:

This commitment was to identify which Station departments are responsible for fuse replacement. This commitment was deleted.

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Basis:

This commitment was made in 1993 and the intent of the commitment continues to be met. The Station procedure that implemented this commitment has been replaced with a standardized procedure that continues to identify departmental responsibility for fuse replacement.

Status:

This commitment was deleted through Commitment Change Identification Number 00-29.

Original Document: Commitment 454230930040005

Subject of Change:

This commitment incorporated a like for like fuse replacement log into a Station administrative procedure that addressed the fuse control program. This commitment was deleted.

Basis:

This commitment was made in 1993 and the intent of the commitment continues to be met. The current procedure that implements the process for replacement of fuses and updating documentation required by the fuse control program addresses actions to take for fuses that would not perform their design function. The like for like fuse replacement log was originally created to trend fuse replacement activities so that fuse failures could be trended. This activity is now addressed by the Corrective Actions Process, which continues to provide the same trending capability.

Status:

This commitment was deleted through Commitment Change Identification Number 00-30.

Original Document: Byron Station Letters 96-0265, "Byron Response to NRC Generic Letter 96-04, Boraflex Degradation in Spent Fuel Pool Racks," and 96-0282, "Revised Byron Response to NRC Generic Letter 96-04, Boraflex Degradation in Spent Fuel Pool Racks"

Subject of Change:

This commitment identified Technical Specification (TS) Surveillance 0BCS 4.9.11-1 as the applicable surveillance to monitor spent fuel pool boron concentration with a daily frequency as a conservative action. When Improved TS were implemented, TS surveillance 0BCSR 7.15.1-1 replaced 0BCS 4.9.11.1 to monitor spent fuel pool boron concentration. This commitment change states that the frequency of boron analysis will be per the applicable TS.

Basis:

This commitment was made in 1996. Procedure steps remain in place to monitor spent fuel pool boron concentration in accordance with current applicable TS requirements. In addition, the spent fuel racks containing Boraflex have been replaced with racks containing Boral for reactivity suppression.

Status:

This commitment was revised through Commitment Change Identification Number 00-035.

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Original Document: Byron Letter 90-110 to the State of Washington, Department of Health

Subject of Change:

A commitment was made in response to a violation of US Department of Transportation regulations that occurred in 1989 involving incorrect labeling of radioactive waste (i.e., radwaste) shipping drums. This commitment was to have Byron Station radwaste shipping procedures require dual independent verification that drums are properly loaded and labeled and/or marked using a drum loading map. This commitment was deleted.

Basis:

This commitment was made in 1990 and the intent of the commitment continues to be met. A new standardized procedure is now in place addressing packaging and shipment of radwaste. The process to ship radwaste is now computerized and does not allow for duplication of numbers on radwaste drums. The current process continues to ensure regulatory requirements are met.

Status:

This commitment was deleted through Commitment Change Identification Number 00-037.

Original Document: Commitment 454251810280001 (NRC IE Bulletin 81-03, "Flow Blockage of Cooling Water to Safety Components by Corbicula SP (Asiatic Clam) and Mytilus SP (Mussel)," Guidance)

Subject of Change:

This commitment was for yearly monitoring for Corbicula (i.e., Asiatic clams) in source water, as described in NRC IE Bulletin 81-03. This commitment was deleted.

Basis:

This commitment was made in 1981. A letter dated September 20, 1995 from Commonwealth Edison (ComEd) Nuclear Licensing to the NRC stated that Byron Station does not need to perform yearly monitoring for Asiatic clams due to continuous chlorination of the Essential Service Water system. Per Generic Letter (GL) 89-13, "Service Water System Problems Affecting Safety-Related Equipment," this action is appropriate if Asiatic clams are found in the service water. Since the Station is already performing corrective action prescribed by the GL if Asiatic clams are found, we no longer need to monitor for the presence of clams. Therefore, this commitment is encompassed by the September 20, 1995 letter and is unnecessary.

Status:

This commitment was deleted through Commitment Change Identification Number 00-038.

Original Document: Response to NRC Notice of Violation 455/90023-02

Subject of Change:

This commitment addressed the requirement for independent concurrent verification of the reactor upper internals package (UIP) load path. This followed an event where UIP guide pins had been damaged. This commitment was implemented as a Quality Control (QC) hold point for verification of the load path. The commitment was changed to permit independent verification of UIP load path by key maintenance or Reactor Services personnel.

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Basis:

This commitment was made in 1990 and the intent of the original commitment continues to be met. Independent verification by key maintenance or Reactor Services personnel in lieu of QC personnel continues to provide equivalent quality verification to prevent recurrence of damage to the reactor UIP.

Status:

This commitment was revised through Commitment Change Identification Number 00-039.

Original Document: Response to NRC Notice of Violation 454/87016-01

Subject of Change:

This commitment was to ensure refueling cavity and spent fuel pool levels were properly documented. Existing Operating procedures at the time were revised to document unit specific level readings. Data was transferred from operator rounds to operating NSO shiftly and daily surveillances. With the implementation of electronic rounds, separate surveillance procedures have been created that continue to record refueling cavity and spent fuel pool levels. As a result, several readings are no longer required to be transferred to the Nuclear Station Operator (NSO) shiftly and daily surveillances. This commitment was deleted.

Basis:

This commitment was made in 1987 and the intent of the commitment continues to be met. Separate procedures and processes remain in place to ensure that refueling cavity and spent fuel pool levels are properly documented.

Status:

This commitment was deleted through Commitment Change Identification Number 00-041.

Original Document: Commitment 4542518890800 (Deviation Report 6-1-88-178)

Subject of Change:

This commitment was to ensure verification of refueling cavity level within two hours prior to control rod or fuel assembly movement and was referenced in an Operations Department shiftly and daily surveillance. This commitment was deleted.

Basis:

This commitment was made in 1988. With the implementation of electronic rounds and the development of new separate surveillance procedures, several of the readings are no longer required to be transferred to the shiftly and daily surveillances. Additionally, with the implementation of Improved Technical Specifications, this verification of refueling cavity level is no longer required.

Status:

This commitment was deleted through Commitment Change Identification Number 00-044.

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Original Document: Unit 1 LER 88-007, "Loss of Shutdown Cooling During Reactor Cavity Level Lowering Evolution Due to Unexpected Flow Phenomenon"

Subject of Change:

This commitment was made to ensure proper guidance was provided for reactor cavity drain down and to provide cautions for methods of cavity level indication for Station procedures that address reactor cavity drain down. This commitment was revised to state that two independent level indications must be available below 402' reactor cavity elevation (it was previously stated as 402'6") and to state that visual indication at or below the top hat is not reliable (it was previously incorrectly stated in the commitment description that visual indication at or below the top hat is reliable).

Basis:

Reactor cavity level instrumentation does not come on scale until 402'6". This change allows a proper channel check to be performed from 402'6" to 402'. The original intent of this commitment remains satisfied. The change to the commitment also corrects a typo in the commitment description to restore original commitment intent, which has been correctly stated in the procedure governing reactor cavity drain down.

Status:

This commitment was revised through Commitment Change Identification Numbers 00-045, 00-046, and 00-047.

Original Document: Unit 2 LER 87-04, "Missed Technical Specification Action Requirement on Containment Isolation Valves Due to Personnel Error"

Subject of Change:

This commitment was made to revise procedures addressing work request processing and testing requirements to include:

- 1) a list of containment isolation valves,
- 2) a requirement for an Operating Engineer and Work Analyst to review this list, and
- 3) to use a stamp to flag a work request that contains an isolation valve.

This commitment was deleted.

Basis:

This commitment was made in 1987 and the intent of the commitment continues to be met. Current processes in place, that govern work request processing, continue to address containment isolation valve identification and testing requirements. Additionally, with the Electronic Work Control System (EWCS) now in use, the containment isolation field is addressed for each piece of equipment as a required field entry and is printed out on a work request.

Status:

This commitment was deleted through Commitment Change Identification Numbers 00-068 and 00-069.

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Original Document: Commitment 4542519014900 (Reference NRC EQ Audit 50-454-88003)

Subject of Change:

This commitment incorporated the following items in the Station administrative procedure addressing Action/Work Request processing. A method was provided for dealing with parts to be rejected, a feedback mechanism was provided for a worker to indicate items needing review, and a mechanism was provided to identify parts approved for use and what parts were used. This commitment was deleted.

Basis:

This commitment was made in 1990 and the intent of the commitment continues to be met. The original Station procedure addressing Action/Work Request processing has been replaced by other Station and corporate procedures addressing non-conforming items, work execution and closeout, and maintenance planning. These existing processes and procedures continue to provide direction previously listed in the commitment.

Status:

This commitment was deleted through Commitment Change Identification Number 00-078.

Original Document: Unit 1 LER 86-031, "Failure to Perform Post Maintenance Testing Due to Personnel Error"

Subject of Change:

This commitment was made to ensure proper review of work activities impacting non-exempt ASME code class 1, 2, and 3 boundary violations to verify proper post maintenance testing is specified and performed. This commitment was deleted.

Basis:

This commitment was made in 1986 and the intent of the commitment continues to be met. Current procedures governing work activities continue to address the requirements identified in the original commitment. This commitment has been proceduralized for a long period of time. The post maintenance testing process remains in effect.

Status:

This commitment was deleted through Commitment Change Identification Number 00-079.

Original Document: Response to NRC Notice of Violation 454-91024-01

Subject of Change:

This commitment was made to continually collect and verify new and existing equipment nameplate data as part of normal maintenance. This commitment was deleted.

Basis:

This commitment was made in 1991 and the intent of the commitment continues to be met. Current procedures and processes provide for component data and parts updates in the EWCS as an inherent part of maintenance planning walkdowns and work execution. As the work processes have evolved, data gathering and retention in EWCS has become a standard practice.

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Status:

This commitment was deleted through Commitment Change Identification Numbers 00-083 and 084.

Original Document: Commitment 4542259110400

Subject of Change:

This commitment was to revise the Station procedure addressing work request testing requirements to delete local leak rate testing and replace with seal leakage testing for selected steam generator blowdown isolation valves, per Technical Specification amendment 39. The subject procedure was revised. This commitment has been deleted.

Basis:

This commitment was made in 1991 and the intent of the commitment continues to be met. Procedures remain in place that provide the process for post maintenance testing which continues to implement the original commitment.

Status:

This commitment was deleted through Commitment Change Identification Number 00-085.

Original Document: Response to NRC Notice of Violation 455-90023-01

Subject of Change:

This commitment was to require modification work packages which have pre out-of-service (OOS)/Limiting Conditions for Operation Action Requirements (LCOARs) work to be broken down into sub-packages delineating pre OOS/LCOAR work from post OOS/LCOAR work. This commitment was deleted.

Basis:

This commitment was made in 1990 and the intent of the commitment continues to be met. The requirement to address separation of work tasks continues to be performed under existing procedures addressing preparation of maintenance work packages. Work tasks are separated by activities and disciplines. This commitment has been proceduralized for a long period of time.

Status:

This commitment was deleted through Commitment Change Identification Number 00-087.

Original Document: Response to NRC Notice of Violation 455-90023-01

Subject of Change:

This commitment was to require initial modification work packages to be reviewed and approved by an Operating Engineer or designee. This commitment was deleted.

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Basis:

This commitment was made in 1990 and the intent of the commitment continues to be met. Current maintenance planning procedures address the work package review process, which includes review by Operations. This commitment has been in place for a long period of time and is an inherent part of the modification work package review process.

Status:

This commitment was deleted through Commitment Change Identification Number 00-088.

Original Document: Response to NRC Notice of Violation 455-90023-01

Subject of Change:

This commitment was to provide a summary of installation steps for modification work packages to address operational and reliability concerns. This commitment was deleted.

Basis:

This commitment was made in 1990 and the intent of the commitment continues to be met. Current work planning procedures and processes addressing preparation of maintenance work packages and maintenance planning provide for work instruction preparation and routing requirements; this includes all work requests including modification work. Level of detail, Out-of-Service, and LCOARs are addressed. This is a standard work package process that has been in place for an extended period of time.

Status:

This commitment was deleted through Commitment Change Identification Number 00-089.

Original Document: Unit 2 LER 92-005, "LCOAR Inadvertently Not Entered"

Subject of Change:

This commitment was made to provide a guideline that lists TS related equipment that had caused confusion in the past (e.g. extraction steam valves, containment isolation valves, etc.) to be available during work request review and screening. This commitment was deleted.

Basis:

This commitment was made in 1992 and the intent of the commitment continues to be met. Current procedures and processes addressing work screening and classification provide for TS applicability review, which is performed by an Operating Department Senior Reactor Operator (SRO) licensed individual. Information pertaining to identification of TS related equipment is contained in the EWCS now in use and is available to facilitate this review.

Status:

This commitment was deleted through Commitment Change Identification Number 00-092.

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Original Document: Commitment 4542518816200 (Reference NRC Inspection Reports 50-454/87016 and 50-454/87026)

Subject of Change:

This commitment was made to ensure the procedure addressing administrative controls during refueling, provided guidance consistent with the wording of Final Safety Analysis Report (FSAR) Section 9.1.4.3.4, "Radiation Shielding," that addressed dose rate at the surface of the water during spent fuel transfer. At the time the commitment was made, the dose rate was limited to 2.5 mRem per hour or less by maintaining a minimum of 10 feet of water above the top of the fuel assembly, as indicated by the low spent fuel pool level alarm being extinguished at elevation 424'2". The current procedure addressing administrative controls during refueling continues to provide guidance consistent with the wording of Updated FSAR (UFSAR) Section 9.1.4.3.4. Current UFSAR Section 9.1.4.3.4 states that the dose rate is limited to less than or equal to 4 mRem per hour above background and states this is accomplished by maintaining a minimum of 9 feet of water above the top of the active region of the fuel assembly. The current procedure addressing administrative controls during refueling also refers to the low spent fuel pool level alarm being extinguished at elevation 424'2". This commitment change updates the commitment description for consistency with verbiage in the UFSAR.

Basis:

This commitment was made in 1987. The current procedure addressing administrative controls during refueling continues to meet the intent of the original commitment. The intent was to ensure that the spent fuel pool level alarm was appropriately calibrated such that the alarm was not always lit and it would serve its purpose of providing indication of reduced level.

Status:

This commitment was revised through Commitment Change Identification Number 00-122.

Original Document: Root Cause Report 455-200-93-00900

Subject of Change:

This commitment was made to have the procedures, governing the testing of the CO2 system actuation push buttons, have separate steps to remove the CO2 push button cover, actuate the push button, and re-install the push button cover. CO2 surveillances were revised as necessary to incorporate this requirement and eliminate unnecessary differences between the procedures. This commitment was deleted.

Basis:

This commitment was made in 1993 and the intent of the commitment continues to be met. Appropriate procedures have integrated the necessary actions to take when removing/installing a CO2 pushbutton cover. This has become a standard practice. Self-check methods have become an expectation when performing steps in a given procedure. The current testing methodology of using air rather than CO2 further mitigates the probability of accidental actuation of CO2 into any fire zone protected by the CO2 system.

Status:

This commitment was deleted through Commitment Change Identification Number 00-125.