

10 CFR 50.90

RS-01-076

April 27, 2001

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

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: Request for Technical Specifications Change
Revision to the Reactor Coolant Pump Flywheel Inspection Program

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," we are proposing a change to the Technical Specifications (TS) of Facility Operating License Nos. NPF-72, NPF-77, NPF-37 and NPF-66 for the Braidwood Station, Units 1 and 2 and the Byron Station, Units 1 and 2, respectively.

TS 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program," requires the inspection of each reactor coolant pump (RCP) flywheel in general conformance with the recommendations of Regulatory Position c.4.b of NRC Regulatory Guide (RG) 1.14, Revision 1, "Reactor Coolant Pump Flywheel Integrity," dated August 1975. The proposed change revises TS 5.5.7 to provide an exception to the recommendations of Regulatory Position c.4.b which would allow either a qualified in-place ultrasonic volumetric examination (i.e., UT) over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (i.e., magnetic particle testing (i.e., MT) and/or liquid penetrant testing (i.e., PT)) of exposed surfaces of the removed flywheel to be conducted at approximately 10-year intervals.

The proposed change is in accordance with the NRC approved Improved Standard TS Generic Change Traveler TSTF-237, Revision 1. Westinghouse Electric Corporation Topical Report WCAP-14535A, "Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination," dated November 1996, provides the technical basis for the elimination of inspection requirements for RCP flywheels for all domestic Westinghouse plants. The NRC issued a Safety Evaluation (SE), dated September 1996, for WCAP-14535A with the following limitations. While WCAP-14535A requested complete RCP flywheel inspection elimination, the NRC concluded in the SE that inspections could not be completely eliminated and should be

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conducted during scheduled inservice inspections or RCP motor maintenance at approximately 10-year intervals.

Flywheel integrity evaluations show a very high flaw tolerance for the RCP flywheels. Operating power plants have been inspecting RCP flywheels for over 20 years, and no flaws have been identified which affect flywheel integrity. Likewise, the results of RCP flywheel inspections performed at the Braidwood Station and the Byron Station identified no indications that would affect flywheel integrity. In addition, overall plant safety could be increased by eliminating these inspections because the potential for flywheel damage during disassembly for inspection and reassembly would be eliminated. Also, eliminating these inspections would lower personnel radiation exposure. The proposed change is consistent with the methodology determined to be feasible by the NRC as documented in WCAP-14535A, and as previously approved by the NRC for other Westinghouse plants, including Millstone Nuclear Power Station Unit 3, South Texas Project Units 1 and 2, North Anna Power Station Units 1 and 2, Donald C. Cook Nuclear Plant Units 1 and 2, Turkey Point Units 3 and 4, Wolf Creek, and H. B. Robinson Unit 2.

We request approval of the proposed change prior to the upcoming Braidwood Station Unit 1, fall 2001 refueling outage, which is currently scheduled to begin September 22, 2001 with RCP flywheel inspections scheduled to begin on September 24, 2001. This would support incorporation of the revised RCP flywheel inspection criteria during the upcoming Braidwood Station Unit 1, fall 2001 refueling outage, thus resulting in dose, schedule, and cost savings.

This proposed amendment request is subdivided as follows.

1. Attachment A gives a description and safety analysis of the proposed change.
2. Attachments B-1 and B-2 include the marked-up TS page with the proposed change indicated for Braidwood Station and Byron Station, respectively. Attachments B-3 and B-4 include the associated typed page with the proposed change incorporated for Braidwood Station and Byron Station, respectively.
3. Attachment C describes our evaluation performed using the criteria in 10 CFR 50.91(a)(1), "Notice for public comment," which provides information supporting a finding of no significant hazards consideration using the standards in 10 CFR 50.92(c), "Issuance of amendment."
4. Attachment D provides information supporting an environmental assessment and a finding that the proposed change satisfies the criteria for a categorical exclusion.

This proposed change has been reviewed by the Braidwood Station and the Byron Station Plant Operations Review Committees and approved by the Nuclear Safety Review Boards in accordance with the requirements of the Quality Assurance Program.

Exelon Generation Company, LLC is notifying the State of Illinois of this application for a change to the TS by transmitting a copy of this letter and its attachments to the designated State Official.

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U. S. Nuclear Regulatory Commission
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Should you have any questions concerning this letter, please contact Ms. Kelly M. Root at (630) 663-7292.

Respectfully,



R. M. Krich
Director - Licensing
Mid-West Regional Operating Group

Affidavit

Attachments:

- Attachment A: Description and Safety Analysis of the Proposed Change
- Attachment B-1: Marked-Up TS Page for Proposed Change for Braidwood Station
- Attachment B-2: Marked-Up TS Page for Proposed Change for Byron Station
- Attachment B-3: Incorporated TS Page for Proposed Change for Braidwood Station
- Attachment B-4: Incorporated TS Page for Proposed Change for Byron Station
- Attachment C: Information Supporting a Finding of No Significant Hazards Consideration
- Attachment D: Information Supporting an Environmental Assessment

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

STATE OF ILLINOIS)
COUNTY OF DUPAGE)
IN THE MATTER OF)
EXELON GENERATION CO., LLC) Docket Numbers
BRAIDWOOD STATION UNITS 1 AND 2) STN 50-456 AND STN 50-457
BYRON STATION UNITS 1 AND 2) STN 50-454 AND STN 50-455

**SUBJECT: Request for Technical Specifications Change
Revision to the Reactor Coolant Pump Flywheel Inspection Program**

AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



R. M. Krich
Director - Licensing
Mid-West Regional Operating Group

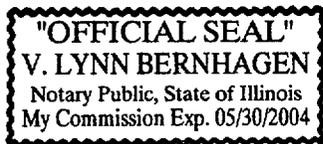
Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 27th day of

April, 2001.



Notary Public



ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGE

A. SUMMARY OF PROPOSED CHANGE

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," we are proposing a change to the Technical Specifications (TS) of Facility Operating License Nos. NPF-72, NPF-77, NPF-37 and NPF-66 for the Braidwood Station, Units 1 and 2 and the Byron Station, Units 1 and 2, respectively.

TS 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program," requires the inspection of each reactor coolant pump (RCP) flywheel in general conformance with the recommendations of Regulatory Position c.4.b of NRC Regulatory Guide (RG) 1.14, Revision 1, "Reactor Coolant Pump Flywheel Integrity," dated August 1975. The proposed change revises TS 5.5.7 to provide an exception to the recommendations of Regulatory Position c.4.b which would allow either a qualified in-place ultrasonic volumetric examination (i.e., UT) over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (i.e., magnetic particle testing (i.e., MT) and/or liquid penetrant testing (i.e., PT)) of exposed surfaces of the removed flywheel to be conducted at approximately 10-year intervals.

The proposed change is in accordance with the NRC approved Improved Standard TS Generic Change Traveler TSTF-237, Revision 1. Westinghouse Electric Corporation Topical Report WCAP-14535A, "Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination," dated November 1996, provides the technical basis for the elimination of inspection requirements for RCP flywheels for all domestic Westinghouse plants. The NRC issued a Safety Evaluation (SE), dated September 1996, for WCAP-14535A with the following limitations. While WCAP-14535A requested complete flywheel inspection elimination, the NRC concluded in the SE that inspections could not be completely eliminated and should be conducted during scheduled inservice inspections or RCP motor maintenance at approximately 10-year intervals.

Flywheel integrity evaluations show a very high flaw tolerance for the RCP flywheels. Operating power plants have been inspecting RCP flywheels for over 20 years, and no flaws have been identified which affect flywheel integrity. Likewise, the results over 70 total RCP flywheel inspections performed at the Braidwood Station and the Byron Station identified no indications that would affect flywheel integrity. The proposed change is consistent with the methodology determined to be feasible by the NRC as documented in WCAP-14535A, and as previously approved by the NRC for other Westinghouse plants, including Millstone Nuclear Power Station Unit 3, South Texas Project Units 1 and 2, North Anna Power Station Units 1 and 2, Donald C. Cook Nuclear Plant Units 1 and 2, Turkey Point Units 3 and 4, Wolf Creek, and H. B. Robinson Unit 2.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

TS 5.5.7 states,

"This program shall provide for the inspection of each reactor coolant pump flywheel in general conformance with the recommendations of Regulatory Position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975."

Regulatory Position c.4.b of Regulatory Guide 1.14, Revision 1, recommends inservice inspections to be performed for each RCP flywheel as follows.

1. An in-place UT of the areas of higher stress concentration at the bore and keyway at approximately 3-year intervals, during the refueling or maintenance shutdown coinciding with the inservice inspection schedule as required by American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV) Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."
2. A surface examination of all exposed surfaces and complete UT at approximately 10-year intervals, during the plant shutdown coinciding with the inservice inspection schedule as required by Section XI of the ASME B&PV Code.

C. BASES FOR THE CURRENT REQUIREMENTS

An integral part of the reactor coolant system (RCS) in a pressurized water reactor (PWR) is the RCP. The RCP ensures an adequate cooling flow rate by circulating large volumes of the primary coolant water at high temperature and pressure through the RCS. Following an assumed loss of power to the RCP motor, the flywheel, in conjunction with the impeller and motor assembly, provide sufficient rotational inertia to assure adequate core cooling flow during RCP coastdown.

During normal power operation, the RCP flywheel possesses sufficient kinetic energy to produce high-energy missiles in the event of failure. Conditions which may result in overspeed of the RCP increase both the potential for failure and the kinetic energy of the flywheel. This led to the issuance of RG 1.14, which was published in 1971 and revised in 1975. RCP flywheel inspections were implemented as a result of RG 1.14, which describes a range of actions to ensure flywheel integrity. One of the recommendations of RG 1.14 is regular inservice volumetric inspection of flywheels.

D. NEED FOR REVISION OF THE REQUIREMENT

Based on the conclusions presented in WCAP-14535A, which are stated below, continued inspections of RCP flywheels are not necessary.

- Flywheels are carefully designed and manufactured from excellent quality steel, which has a high fracture toughness.
- Flywheel overspeed is the critical loading, but RCP piping leak-before-break considerations have limited the maximum speed to less than 1500 rpm.
- Flywheel inspections have been performed for 20 years with no indications of service induced flaws.
- Flywheel integrity evaluations show a very high flaw tolerance for the RCP flywheels.
- Crack extension over a 60-year service life is negligible.
- Structural reliability studies have shown that eliminating inspections after 10 years of plant life will not significantly change the probability of failure.
- Inspections result in man-rem exposure and the potential for flywheel damage during assembly and reassembly.

Operating power plants have been inspecting RCP flywheels for over 20 years, and no flaws have been identified which affect flywheel integrity. The results of over 70 total RCP flywheel inspections performed at the Braidwood Station and the Byron Station identified no indications that would affect flywheel integrity. In addition, overall plant safety could be increased by eliminating these inspections because the potential for flywheel damage during disassembly for inspection and reassembly would be eliminated. Also, eliminating these inspections would lower personnel radiation exposure. This change is proposed to support incorporation of the revised RCP flywheel inspection criteria during the upcoming Braidwood Station Unit 1, fall 2001 refueling outage currently scheduled to begin September 22, 2001, thus resulting in dose, schedule, and cost savings. The proposed change would result in a total cost savings of approximately \$300,000 per inspection interval. The current flywheel inspection program has a significant impact on the outage schedule in that support for the examinations requires the use of the containment polar crane which is normally dedicated to critical path activities.

E. DESCRIPTION OF THE PROPOSED CHANGES

The proposed change revises TS 5.5.7 as follows.

"This program shall provide for the inspection of each reactor coolant pump flywheel in general conformance with the recommendations of Regulatory Position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

In lieu of Regulatory Position c.4.b(1) and c.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheel may be conducted at approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI."

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

WCAP-14535A provides the technical basis for the elimination of inspection requirements for RCP flywheels for all domestic Westinghouse plants. The NRC issued a SE for WCAP-14535A with the following provisions.

- Inspections need only be done on a 10-year interval instead of the current 40-month interval.
- Acceptable inspection methods are either UT or surface examinations (i.e., MT and/or PT).
- UT coverage is required only on the inner half of the flywheel radius.
- Surface examination coverage is the exposed surfaces of the flywheel when the pump is disassembled for maintenance.
- Licensees can reference the SE for WCAP-14535A in license applications and detailed technical reviews of the submittals will not be required unless new technical information is presented.

In the SE for WCAP-14535A, the NRC stated that the evaluation methodology described in WCAP-14535A is appropriate and the criteria are in accordance with the design criteria of RG 1.14. In addition, while WCAP-14535A requested complete flywheel inspection elimination, the NRC concluded that inspections could not be completely eliminated. Rather, a qualified in-place UT over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface

examination (i.e., MT and/or PT) of exposed surfaces of the removed flywheel should be conducted during scheduled inservice inspections or RCP motor maintenance at approximately 10-year intervals. The SE for WCAP-14535A requires licensees who plan to submit a plant-specific application of WCAP-14535A to confirm that their flywheels are made of SA 533 B material. All 18 flywheels, including the two spare RCP motors, at the Braidwood Station, Units 1 and 2 (i.e., eight total flywheels) and at the Byron Station, Units 1 and 2 (i.e., eight total flywheels) are Group 3 flywheels as defined in WCAP-14535A and are made of SA 533 B material. Since the flywheels do not belong to either Group 10 or Group 15 flywheels, no additional analyses are required. Therefore, the plant-specific applicability of WCAP-14535A to the Braidwood Station and the Byron Station is confirmed and the 10-year inspection requirement stated above is acceptable.

G. IMPACT ON PREVIOUS SUBMITTALS

We have reviewed the proposed change regarding its impact on any previous submittals and have determined that there is no impact on any previous submittals.

H. SCHEDULE REQUIREMENTS

We request approval of the proposed change prior to the upcoming Braidwood Station Unit 1, fall 2001 refueling outage, which is currently scheduled to begin September 22, 2001 with RCP flywheel inspections scheduled to begin on September 24, 2001. This would support incorporation of the revised RCP flywheel inspection criteria during the upcoming Braidwood Station Unit 1, fall 2001 refueling outage, thus resulting in significant dose, schedule, and cost savings.

ATTACHMENT B-1

**MARKED-UP TS PAGE FOR PROPOSED CHANGE
BRAIDWOOD STATION, UNITS 1 AND 2**

MARKED-UP TS PAGE

5.5-5

5.5 Programs and Manuals

5.5.6 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in conformance with requirements of 10 CFR 50.55a(b)(2)(vi), 10 CFR 50.55a(b)(2)(ix), ASME Boiler and Pressure Vessel Code Subsection IWL, 1992 Edition with the 1992 Addenda and Regulatory Guide 1.35.1, July 1990.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel in general conformance with the recommendations of Regulatory Position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

In lieu of Regulatory Position c.4.b(1) and c.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheel may be conducted at approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI.

ATTACHMENT B-2

**MARKED-UP TS PAGE FOR PROPOSED CHANGE
BYRON STATION, UNITS 1 AND 2**

MARKED-UP TS PAGE

5.5-5

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In lieu of Regulatory Position c.4.b(1) and c.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheel may be conducted at approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI.

ATTACHMENT B-3

**INCORPORATED TS PAGE FOR PROPOSED CHANGE
BRAIDWOOD STATION, UNITS 1 AND 2**

TS PAGE

5.5-5

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ATTACHMENT B-4

**INCORPORATED TS PAGE FOR PROPOSED CHANGE
BYRON STATION, UNITS 1 AND 2**

TS PAGE

5.5-5

5.5 Programs and Manuals

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The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

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In lieu of Regulatory Position c.4.b(1) and c.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheel may be conducted at approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI.

ATTACHMENT C

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

According to 10 CFR 50.92(c), "Issuance of amendment," a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

Exelon Generation Company, LCC is proposing a change to the Technical Specifications (TS) of Facility Operating License Nos. NPF-72, NPF-77, NPF-37 and NPF-66, for the Braidwood Station, Units 1 and 2, and the Byron Station, Units 1 and 2, respectively.

TS 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program," requires the inspection of each reactor coolant pump (RCP) flywheel in general conformance with the recommendations of Regulatory Position c.4.b of Regulatory Guide (RG) 1.14, Revision 1, "Reactor Coolant Pump Flywheel Integrity," dated August 1975. Regulatory Positions c.4.b(1) and c.4.b(2) require an in-place ultrasonic volumetric examination of the areas of higher stress concentration at the bore and keyway at approximately 3-year intervals and a surface examination of all exposed surfaces and complete ultrasonic volumetric examination at approximately 10-year intervals. The proposed change revises TS 5.5.7 to provide an exception to the recommendations of Regulatory Position c.4.b which would allow either a qualified in-place ultrasonic volumetric examination (i.e., UT) over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (i.e., magnetic particle testing (i.e., MT) and/or liquid penetrant testing (i.e., PT)) of exposed surfaces of the removed flywheel to be conducted at approximately 10-year intervals. The proposed change is in accordance with the NRC approved Improved Standard TS Generic Change Traveler TSTF-237, Revision 1.

Information supporting the determination that the criteria set forth in 10 CFR 50.92 are met for this amendment request is indicated below.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

An integral part of the Reactor Coolant System (RCS) in a Pressurized Water Reactor (PWR) is the Reactor Coolant Pump (RCP). The RCP ensures an adequate cooling flow rate by circulating large volumes of the primary coolant water at high temperature and pressure through the RCS. Following an assumed loss of power to the RCP motor, the flywheel, in conjunction with the impeller and motor assembly, provide sufficient rotational inertia to assure adequate core cooling flow during RCP coastdown.

Westinghouse Electric Corporation Topical Report WCAP-14535A, "Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination," dated November 1996, provides the technical basis for the elimination of inspection requirements for RCP flywheels for all domestic Westinghouse plants. In the Safety Evaluation for WCAP-14535A, dated September 1996, the NRC stated that the evaluation methodology described in WCAP-14535A is appropriate and the criteria are in accordance with the design criteria of RG 1.14. RCP flywheel inspections have been performed for 20 years with no indications of service induced flaws. Flywheel integrity evaluations show a very high flaw tolerance for the RCP flywheels. Crack extension over a 60-year service life is negligible. Structural reliability studies have shown that eliminating inspections after 10 years of plant life will not significantly change the probability of failure.

The proposed change does not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, and configuration of the facility or the manner in which the plant is operated and maintained. The proposed change does not alter or prevent the ability of structures, systems, and components (SSC) from performing their intended function to mitigate the consequences of an initiating event within the acceptance limits assumed in the Braidwood and Byron Stations' Updated Final Safety Analysis Report (UFSAR). The proposed changes do not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated in the Braidwood and Byron Stations' UFSAR.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not modify the design or function of the RCP flywheels. Based upon the results of WCAP-14535A, no new failure mechanisms will be introduced by the revised RCP Flywheel Inspection Program. As presented in WCAP-14535A, detailed stress analysis and risk assessments have been performed that indicate that there would be no change in the probability of failure for RCP flywheels if all inspections were eliminated. Flywheel integrity evaluations show that RCP flywheels exhibit a very high tolerance for the presence of flaws.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

There is no significant mechanism for in-service degradation of the flywheels since they are isolated from the primary coolant environment. Additionally WCAP-14535A analyses have shown there is no significant deformation of the flywheels even at maximum overspeed conditions. Likewise, the results of RCP flywheel inspections performed throughout the industry and at the Braidwood Station and the Byron Station identified no indications that would affect flywheel integrity.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

ATTACHMENT D

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

Exelon Generation Company, LLC has evaluated the proposed change against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." Exelon has determined that the proposed change meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9), "Criteria for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b), "Issuance of amendment." This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," which changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation," or which changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria.

The proposed change revises TS 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program." TS 5.5.7 requires the inspection of each reactor coolant pump (RCP) flywheel in general conformance with the recommendations of Regulatory Position c.4.b of Regulatory Guide (RG) 1.14, Revision 1, "Reactor Coolant Pump Flywheel Integrity," dated August 1975. The proposed change revises TS 5.5.7 to provide an exception to the recommendations of Regulatory Position c.4.b which would allow either a qualified in-place ultrasonic volumetric examination (i.e., UT) over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (i.e., magnetic particle testing (i.e., MT) and/or liquid penetrant testing (i.e., PT)) of exposed surfaces of the removed flywheel to be conducted at approximately 10-year intervals.

- (i) **The proposed change involves no significant hazards consideration.**
As demonstrated in Attachment C, the proposed change does not involve any significant hazards consideration.
- (ii) **There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.**
The proposed change does not allow for an increase in the unit power level, does not increase the production, nor alter the flow path or method of disposal of radioactive waste or by-products. The proposed change does not affect actual unit effluents. Therefore, the proposed change does not change the types or increase the amounts of any effluents released offsite.
- (iii) **There is no significant increase in individual or cumulative occupational radiation exposure.**
The proposed change will not result in changes in the operation or configuration of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels within the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from the proposed change.