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United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 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, 2002, through December 31, 2002. Revisions to docketed regulatory commitments were processed using Nuclear Energy Institute's document NEI 99-04, "Guidelines for Managing Nuclear Regulatory Commission (NRC) Commitment Changes," Revision 0.

If you have any questions concerning this report, please contact William Grundmann, Regulatory Assurance Manager, at (815) 406-2800.

Respectfully,



Richard P. Lopriore  
Site Vice President  
Byron Nuclear Generating Station

RPL/DD/rah

Attachment

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

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**ATTACHMENT**

**BYRON STATION  
REGULATORY COMMITMENT CHANGE SUMMARY REPORT  
FOR 2002**

## BYRON STATION

### REGULATORY COMMITMENT CHANGE SUMMARY REPORT

#### Original Document:

Commitments 454-200-96-0058-26, 27, 28, 29, 30 (LER 96-019-05, Ultimate Heat Sink Outside Design Basis due to Silt and Calculation Errors)

#### Subject of Change:

These commitments were made in response to the above listed LER. The commitments required that 26 non-Technical Specification surveillance procedures be revised to clarify the requirements for:

- Addressing the potential operability impacts of SX and other safety related equipment.
- Adding a step to notify their supervisor and the Shift Manager for an operability review if the condition of the equipment is found out of the acceptance criteria.

This commitment was deleted.

#### Basis:

The intent of this commitment has been administratively and procedurally institutionalized for an extended period of time and is subject to an ongoing periodic review process. Further emphasis on reference to the original commitment is no longer warranted in these surveillance procedures.

#### Status:

These commitments were deleted through Commitment Change Identification Number 02-061.

#### Original Document:

Commitments 454-200-96-0058-04.02AB, AC, D, E, F, G, H, J, L, M, N, P, Q, R, S, T, U, V, W, X, Y, Z (NRC Enforcement Conference 96-508, PIR #454-200-96-0058)

#### Subject of Change:

These commitments were made in response to LER 96-019-05, Ultimate Heat Sink Outside Design Basis due to Silt and Calculation Errors. These commitments required that the Electrical Maintenance Department reword surveillance acceptance criteria to make it clear and understandable for the end user. The commitments required that the surveillance acceptance criteria and the applicable step in the surveillance procedures read the same. This commitment was deleted.

#### Basis:

The intent of this commitment has been administratively and procedurally institutionalized for an extended period of time and is subject to an ongoing periodic review process. Further emphasis on reference to the original commitment is no longer warranted in these surveillance procedures.

#### Status:

These commitments were deleted through Commitment Change Identification Number 02-062.

## BYRON STATION

### REGULATORY COMMITMENT CHANGE SUMMARY REPORT

**Original Document:**

Commitment 454-251-89-27300 (NRC Open Item 454/88-019-01 and associated NRC Violation 454/88-019-01)

**Subject of Change:**

This commitment was made in response to the above listed NRC Violation. The commitment required that procedural guidance be added to Byron Operating Procedure BOP-RY-09, Pump Down of the Refueling Cavity to the RWST. This guidance was added to relate gallons of water per foot of level change for the refueling cavity. This commitment was deleted.

**Basis:**

A review of procedures indicates that due to progressive improvements both on an operational and procedural basis, the intended functions of this commitment have been institutionally implemented and continued emphasis in BOP RH-9, Pump Down of the Refueling Cavity to the RWST, is no longer warranted.

Based on a review of current operating and industry practices, this commitment has been administratively implemented to address the issues originally identified. Administrative requirements in the form of procedural restraints and extensive Operator training have been implemented in the area of refueling operations.

**Status:**

This commitment was deleted through Commitment Change Identification Number 02-069.

**Original Document:**

Commitment 454-251-88-24300 (Generic Letter 83-28, Item 3.1.1)

**Subject of Change:**

This commitment was made in response to Item 3.1.1 of Generic Letter 83-28, Required Actions Based on Generic Implications of Salem ATWS Events. This commitment required that licenses and applicants shall submit the results of their review of tests and maintenance procedures and Technical Specifications to assure that post-maintenance operability testing of safety related components in the reactor trip system is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service. This commitment was deleted.

**Basis:**

Byron Station has an approved administrative procedure BAP 330-1 (superceded by OP-MW-109-101, Clearance and Tagging) addressing removing equipment from service and returning the equipment back to service. The procedure requires the Shift Control Room Supervisor to identify surveillances required to be conducted prior to return to service. The Shift Control Room Supervisor reviews any required surveillances to ensure components and sub-systems are operable.

In addition, the Electrical Maintenance procedure BHP 4200-15, (superceded by MA-AP-725-104, Preventative Maintenance on Westinghouse Reactor Trip and Bypass Circuit Breakers) addressing maintenance and adjustment of reactor trip breakers has been revised to require notification of the shift manager upon completion of work.

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The intent of this commitment has been administratively and procedurally institutionalized for an extended period of time and is subject to an ongoing periodic review process. Further emphasis on reference to the original commitment is no longer warranted in these surveillance procedures.

Status:

This commitment was deleted through Commitment Change Identification Number 02-119.

Original Document:

Commitment 454-251-88-24600 (Generic Letter 83-28, Items 4.1.1 and 4.2.1)

Subject of Change:

This commitment was made in response to Items 4.1.1 and 4.2.1 of Generic Letter 83-28, Required Actions Based on Generic Implications of Salem ATWS Events. This commitment required that:

- All vendor recommended reactor trip breaker modifications shall be reviewed to verify that either: (1) each modification has, in fact, been implemented; or (2) a written evaluation of the technical reasons for not implementing a modification exists.
- Licensees and applicants shall describe their preventative maintenance and surveillance program to ensure reliable reactor trip breaker operation. The program shall include the following. (1) A planned program of periodic maintenance, including lubrication, housekeeping, and other items recommended by the equipment supplier.

These commitments were deleted.

Basis:

Exelon Procedure MA-AP-725-104, Preventative Maintenance on Westinghouse Reactor Trip and Bypass Circuit Breakers, is the procedure that covers the periodic maintenance inspection of the reactor trip breakers, type DS-416. This inspection incorporates lubrication, housekeeping, and other items recommended by Westinghouse in the Technical Manual supplied with the original equipment.

The intent of this commitment has been administratively and procedurally institutionalized for an extended period of time and is subject to an ongoing periodic review process. Further emphasis on reference to the original commitment is no longer warranted in these surveillance procedures.

Status:

These commitments were deleted through Commitment Change Identification Number 02-120.

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### REGULATORY COMMITMENT CHANGE SUMMARY REPORT

#### Original Document:

Generic Letter 88-05 Response, Boric Acid Corrosion of Carbon Steel Reactor Pressure Boundary Components in PWR Plants, dated May 31, 1988.

#### Subject of Change:

Generic Letter 88-05 was issued on March 17, 1988 in response to multiple leaks of primary coolant due to boric acid degradation of carbon steel components. The NRC asked for several issues to be addressed as part of the response.

The response the station committed to was that a walk down (commonly referred to as the Mode 3 Walk down) of containment would be performed using the VT-2 procedure and VT certified examiners. When executing a VT-2 exam, the code requires that you be at normal operating pressure. Since the majority of the piping in containment that contains boric acid is the Reactor Coolant System (RSC) the station always stipulated that this exam be performed at Normal Operating Pressure and Normal Operating Temperature (NOP/NOT). With the current shortened outage duration, the station shutdown processes require that cool down of the RSC be initiated as soon as possible. This emphasis on cooling down the RSC as soon as possible after the reactor has been shutdown would require that RSC pressure be lowered with reduced RCS temperature. This situation might cause the Mode 3 walk down to not be completed prior to RCS pressure/temperature be reduced below NOP/NOT. This is technically not allowed by the ASME Section XI code requirements for performance of a VT-2. Since this is not a code exam required by ASME Section XI the reduction in pressure is not a violation of the ASME code.

The original commitment selected the VT-2 exam for meeting the requirements of G.L. 88-05 as a way of ensuring that qualified individuals experienced in performing visual exams would complete the walk downs of piping systems and surrounding areas when looking for boric acid leaks and possible degradation.

The stations intent is to continue to perform the containment walk down at shutdown with VT-2 certified individuals and use the current VT-2 procedure and processes with the exception that RCS pressure will be allowed to drop below NOP/NOT if necessary. The station will continue to perform the VT-2 exam and if leakage is found write corrective work requests and complete all necessary evaluations if degradation is found.

#### Basis:

This walk down of containment at shutdown while looking for possible degradation due to boric acid leaks on carbon steel components is not an ASME Section XI examination and therefore does not require pressure to be maintained during the exam.

The intent of this walk down is to determine if any leakage has occurred during the previous operating cycle and to facilitate repairs of components that may have been affected by possible boric acid leakage. This reduction in pressure during the walk down would not affect the ability of the VT examiner to locate any leakage that may have occurred during the cycle, as discussed below.

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These leaks can be characterized as two possible types; either an active leak where water is actively emanating from the component and usually has a puddle of water on the floor as evidence or dry inactive leaks where there is a buildup of boric acid crystals on the component. Both of these two types of leaks are readily visible to the VT examiner.

Therefore any reduction in pressure during the walk down would not affect the ability of the VT examiner in locating any leaks that may have occurred during the previous operating cycle.

The revised commitment preserves the intent of the original commitment.

**Status:**

This commitment was revised through Commitment Change Identification Number 02-155.

**Original Document:**

Commitment 454-251-88-44000-01 (LER 454-87-023, Control Room Ventilation Radiation Monitor Inoperable Due to Improper Calibration Resulting From a Personnel Error)

**Subject of Change:**

This commitment required that only Radiation Protection or Chemistry personnel issue radioactive sources, and that the radioactive source issuer and receiver both verify that the correct radioactive source has been issued. This commitment is being deleted.

**Basis:**

NSP Standardized Procedure RP-AA-800, Control, Inventory, and Leak Testing of Radioactive Sources, has replaced the station specific procedure. RP-AA-800, Step 4.4.1, contains the following equivalent information "Attachment 1, Source Control Log (or equivalent), shall be completed when issuing sources for use by individuals. The source control procedure continues to require logging out of a radioactive source, documenting all pertinent information, and requires the return of the source. Radioactive sources will continue to be controlled and accounted for.

**Status:**

This commitment was deleted through Commitment Change Identification Number 02-166.

**Original Document:**

Commitment 454-251-83-00200-01 (Information Notice 83-16, Contamination of the Auburn Steel Company Property With Cobalt-60)

**Subject of Change:**

This commitment required documentation for the disposal of all radioactive sources. This commitment was deleted.

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Basis:

NSP Standardized Procedure RP-AA-800, Control, Inventory, and Leak Testing of Radioactive Sources, has replaced the station specific procedure. RP-AA-800, Step 4.4.1, contains the following equivalent information "Maintain records of receipt of radioactive sources, including any incoming paperwork about the source, for as long as the source is kept onsite, and for at least three years following the transfer or disposal of the source.

Status:

This commitment was deleted through Commitment Change Identification Number 02-167.

Original Document:

Commitment 454-100-97-00304-01 (NRC Inspection Report NOV 454/455-97-003)

Subject of Change:

This commitment required that BAP 560-10, Byron Chemistry Post-Accident Program Description, be revised to clarify the requirements for Post Accident Sampling System training for the Chemistry technicians. This commitment was deleted.

Basis:

The annual Post accident Sampling System training of Chemistry technicians is no longer required following the License Amendment 121/126 for PASS elimination.

Status:

This commitment was deleted through Commitment Change Identification Number 02-170.

Original Document:

Commitments 454-251-88-84500-01 and 454-251-88-84400-01 (NRC Open Item 50-454/83-03, 50-455/83-012-03)

Subject of Change:

These commitments required the development of procedures and a quality assurance/quality control program for radiochemistry sampling, counting, and analysis. This commitment has been deleted.

Basis:

These actions are now complete. The associated Chemistry Department procedures are a standard part of the chemistry program, and meet all industry practices. These procedures have been in place since 1983. The intent of the original commitment continues to be met.

Status:

These commitments were deleted through Commitment Change Identification Numbers 02-171 and 02-172.



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### REGULATORY COMMITMENT CHANGE SUMMARY REPORT

**Original Document:**

Commitment 454-251-89-25700 (Response to NRC Bulletin 88-02, Rapidly Propagating Fatigue Cracks In Steam Generator Tubes)

**Subject of Change:**

The original commitment required that the most recent steam generator inspection data be reviewed for evidence of denting at the uppermost tube support plate. Inspection records may be considered adequate for this purpose if at least 3% of the total steam generator tube population was inspected at the uppermost support plate elevation during the last 40 calendar months. "Denting" should be considered to include evidence of upper support plate corrosion and the presence of magnetite in the tube-to-support plate crevices, regardless of whether there is detectable distortion of the tubes. The results of this review shall be included as part of the 45-day report. Where inspection records are not adequate for this purpose, inspections of at least 3% of the total steam generator tube population at the uppermost support plate elevation should be performed at the next refueling outage. The schedule for these inspections shall be included as part of the 45-day report and the results of the inspections shall be submitted within 45 days of their completion. This commitment has been deleted.

**Basis:**

The issues in the NRC Bulletin have been addressed. The station continues to follow the industry best practices for steam generator inspections.

**Status:**

This commitment was deleted through Commitment Change Identification Number 02-174.

**Original Document:**

Commitment 455-251-88-08800-01 (Supplemental Response to NRC Generic Letter 89-13, Service Water System Problems Affecting Safety Related Equipment)

**Subject of Change:**

The original commitment stated that the Station would inspect the River Screen House for clams on an annual basis. This is typically done in the summer months. The inspection will be expanded to include the Essential Service Water Cooling Tower Basin. The results of the inspections are evaluated for the need for corrective action. This commitment is being deleted.

**Basis:**

The commitment can be deleted since the actions addressed in the generic letter response have been accomplished and are a part of the standard plant practices. The station no longer samples for Asiatic clams, per the September 29, 1995 Supplemental Response to NRC Generic Letter 89-13, since chlorination occurs continuously in Essential Service Water system.

**Status:**

This commitment was deleted through Commitment Change Identification Number 02-178.