

RS-03-240

December 30, 2003

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457Byron 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: Clarification of Compensatory Actions Associated with a License Amendment Request for a One-Time Extension of the Essential Service Water Train Completion Time

- References:
- (1) Letter from Keith R. Jury (Exelon Generation Company, LLC) to U.S. NRC, "Request for a License Amendment for a One-Time Extension of the Essential Service Water Train Completion Time," dated June 11, 2003
  - (2) Letter from George F. Dick (NRC) to John L. Skolds (Exelon Generation Company, LLC), "Request for Additional Information Regarding a One-Time Extension of the Essential Service Water Completion Time – Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2," dated October 30, 2003
  - (3) Letter from K. A. Ainger (Exelon Generation Company, LLC) to U.S. NRC, "Request for Additional Information Regarding a License Amendment for a One-Time Extension of the Essential Service Water Train Completion Time," dated December 5, 2003

In Reference 1, Exelon Generation Company, LLC (EGC) requested NRC approval of a proposed change to Appendix C, "Additional Conditions," 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. The proposed change would add a license condition that increases the Completion Time (CT) for Required Action A.1, "Restore unit-specific SX train to OPERABLE status," associated with Technical Specifications (TS) Section 3.7.8, "Essential Service Water (SX) System," from 72 hours to 144 hours. This proposed change would only be used one time on each unit at Byron Station and on Unit 1 only at Braidwood Station.

During the NRC's review of the proposed change, a number of questions were raised and subsequently, in Reference 2, the NRC requested that we provide additional information to support justification of the proposed change. This information was provided to the NRC in Reference 3. Our response to Question 3 of Reference 3 discusses the compensatory actions that will be taken during the extended CT of the TS Required Action statement while performing the SX train maintenance. Based on subsequent conversations with the NRC, the following clarifies our response to Question 3 regarding restricting maintenance on the emergency diesel generators (EDGs). The NRC question and our revised response are given below.

3. *Describe the compensatory measures that will be taken to preserve the SX function against the adverse affects of inclement weather conditions that might arise, and to preserve on-site and off-site electrical sources during the period of allowed outage time (AOT) extension.*

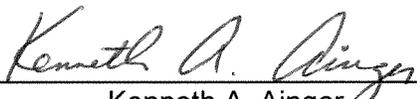
Response to Question 3

The SX pumps and all support equipment are located in structures that are designed to withstand the effects of severe weather including tornados and high winds. The major impact of such events is, therefore, the initiation of a Loss of Offsite Power (LOOP) event. As identified in Tables 12-1, 12-2, and 12-3 of our June 11, 2003 submittal (i.e., Reference 1), planned maintenance on the EDGs and associated electrical buses, in the train opposite that of the inoperable SX train, will be restricted during the extended CT of the TS Required Action statement (i.e., while the "B" SX train is inoperable during the pump suction valve replacement, planned maintenance on the "A" train EDGs (i.e., 1A and 2A EDGs) and associated electrical buses will not be performed. Similarly, while the "A" SX train is inoperable during the pump suction valve replacement, planned maintenance on the "B" train EDGs (i.e., 1B and 2B EDGs) and associated electrical buses will not be performed). This "protected" equipment assures that electrical power will be available to the operable train should a LOOP occur.

Should you have any questions related to this matter, please contact J. A. Bauer at (630) 657-2801.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12-30-03

  
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Kenneth A. Ainger  
Manager, Licensing