

Exelon Generation Company, LLC www.exeloncorp.com
Byron Station
4450 North German Church Road
Byron, IL 61010-9794

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U. S. Nuclear Regulatory Commission
ATTN: 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, 2003, through December 31, 2003. 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,



Stephen E. Kuczynski
Site Vice President
Byron Station

SEK/DD/rah

Attachment

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

A001

ATTACHMENT

**BYRON STATION
REGULATORY COMMITMENT CHANGE SUMMARY REPORT
FOR 2003**

BYRON STATION

REGULATORY COMMITMENT CHANGE SUMMARY REPORT

Original Document:

Commitment 454-251-84-00800-01 (NRC Information Notice 84-18, Stress Corrosion Cracking in Pressurized Water Reactor Systems)

Subject of Change:

This commitment was made in response to the above listed NRC Information Notice. The commitment specifically requires sampling for halogens. This commitment is deleted.

Basis:

The importance of limiting contaminants in the Reactor Coolant water (and water that may come into contact with Reactor Coolant) is well understood by the Station and the Chemistry Department. Sampling frequencies and limits are established in procedures to monitor for halogens. There is no longer a need to track this as a commitment.

Status:

This commitment was deleted under Commitment Change Number 03-004.

Original Document:

NRC Generic Letter 89-13, Service Water System Problems Affecting Safety-Related Equipment

Subject of Change:

The original station response stated that Byron's Generic Letter 89-13 program will include trending of heat exchanger performance so that the optimal testing frequency can be determined (not to exceed five years for each heat exchanger). The revised commitment states that Byron's Generic Letter 89-13 program will include trending of heat exchanger performance testing and inspections so that the optimal testing or inspection interval can be determined but not longer than once every five years (subject to a +/- 25% grace period) for each heat exchanger.

Basis:

The change (frequency extension) will facilitate surveillance scheduling as it considers unit operating conditions that may not be suitable for conducting the surveillance (e.g., transient conditions or other ongoing surveillance or maintenance activities). Based on very good results from prior inspections and tests, longer periods may be acceptable. The application of a grace period to heat exchanger performance monitoring and inspection frequencies is also consistent with Technical Specification SR 3.0.2, where a frequency extension of 1.25 may be applied to period performances on a "once per..." basis. This extension does not apply to the initial portion of a periodic completion time for any heat exchanger newly added to the program scope.

Status:

This commitment was revised under Commitment Change Number 03-014.

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Original Document:

Commitment 454-180-96-0012-01 (from Licensee Event Report 96-012-00, Technical Specification Action Statement Not Entered for Tornado Watch)

Subject of Change:

The original commitment was to add a weekly check of the weather alert radios located in the Main Control Room and the Shift Manager's Office to an existing procedure, or to create a new procedure for this purpose. The revised commitment will be to modify the weekly check to a bi-weekly check of the weather alert radios located in the Main Control Room and the Work Execution Center in the existing procedure.

Basis:

The Main Control Room weather alert radio is a module located in the Motorola base radio unit, and is connected to an antenna located outside of the Main Control Room. The Main Control Room is manned on a continuous basis. The Work Execution Center weather alert radio is also connected to an external antenna. The National Weather Service performs a weekly test of the weather alert radio system. The station surveillance that is performed is an additional test to ensure weather alert radio operability. The reliability of the weather alert radio system has been improved by the use of external antennae, as well as by locating a weather alert radio in the Main Control Room, which is staffed around the clock.

Status:

This commitment was revised under Commitment Change Number 03-015.

Original Document:

Commitments 454-251-88-0500 (Letter from D. Galle and T.J. Maiman to Station Managers dated June 26, 1988) and 454-225-89-26500 (Letter from D. Galle and T.J. Maiman to Station Managers dated August 15, 1989)

Subject of Change:

The subject of these two commitments was to write a LCOAR to track ESF Bus DC Grounds, and to review and revise operations procedures as necessary to incorporate the requirements of a new Nuclear Operations Directive on DC grounds. Operating procedures 1/2BOS DC1-1A were written to meet these commitments. The commitment being changed in these procedures is a revision from the current DC ground alarm set point of 70 volts to a new set point of 100 volts.

Basis:

Justification for this change includes:

- o The Exelon DC Task Force benchmark comparison of DC ground alarm/action levels indicates that most of the DC ground alarm set points are overly conservative.
- o The proposed DC ground alarm set point aligns IEEE with Standard 946-1992, Annex C "Effect of Grounds On the Operation of DC Auxiliary Power Systems".
- o Operations Department resources are frequently expended responding to moisture-induced transient alarms that correspond to relatively insignificant transient grounds. The Work Planning, Maintenance and Engineering Departments also frequently expend resources investigating insignificant transient grounds. The 40,000-ohm alarm level will alert the Operations

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Department to a potential increased risk of mis-operation of plant components and reduce the number of nuisance alarms received in the Main Control Room..

- Braidwood Station has implemented an engineering change that changed the ESF DC Bus Ground alarm set point from 70Vdc (120,000-ohm) to 103Vdc (40,000-ohm). The Exelon DC Task Force recommends that Byron also implement this change.
- Implementation of this set point change is part of the action plan for the Byron Operator Work-Around Operator Challenge #268.
- The Byron Plant Engineering Department of ESF DC Bus Ground alarm set points is complete.
- A fault resistance of $\geq 40,000$ -ohms will limit fault current on a second hard ground and an alarm at this setting is sufficient to prevent false equipment operations and limit short circuit current to a value that would reduce equipment damage. This value is conservative and allows for a wide range of station equipment.
- The 40,000-ohm threshold for "critical" resistance is consistent with current standards.

Status:

These commitments were revised under Commitment Change Number 03-017.