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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, 2004, through December 31, 2004. 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,

(signed by)
Stephen E. Kuczynski
Site Vice President
Byron Station

SEK/TLF/et

Attachment

ATTACHMENT

BYRON STATION

REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2004

Original Document:

Commitment 454-104-97-00500 "NRC Generic Letter 97-05, Steam Generator Tube Inspection Techniques".

Subject of Change:

Generic Letter (GL) 97-05 was written to emphasize the importance of performing steam generator tube inspections in accordance with the requirements of Appendix B to 10 CFR Part 50. The original commitment stated that only tube wear associated with support structures will be acceptable to allow steam generator tubes to remain in service. This commitment has been fully implemented for both Byron Units 1 and 2 dating from the time the original response was submitted in February 1998, through the (then) most recent Unit 2 Steam Generator inspection in September 2002.

Basis:

At the time of the original response to GL 97-05, submitted in February 1998, the EPRI Appendix H qualified inspection techniques to size indications of wear were limited to wear associated with support structures i.e., Antivibration Bars, Lattice Grids, and Tube Support Plates. Since that time, EPRI Appendix H qualified techniques have been developed to size tube wear associated with secondary side foreign objects. The revised commitment wording is consistent with the original in that it still refers to using EPRI Appendix H qualified inspection techniques to size indications of wear which will be evaluated for continued service of the steam generator tubes.

Status:

The commitment was revised under Commitment Change Number 04-001.

Original Document:

Commitment 454-251-90-15100 "NRC Generic Letter 89-13, Service Water System Problems Affecting Safety Related Equipment"

Subject of Change:

The original commitment was to develop and implement procedures which establish service water flush flow once every six months through the diesel generator jacket water cooler essential service water cross connects. This change is associated with a one-time deferral of the frequency of the service water flush from six months to one year.

Basis:

Technical Specification (TS) compliance concerns were raised over the current methodology of performing the flush. Resolution of this issue in addition to possible changes to the procedure, would have taken longer than the critical dates of the scheduled surveillance. Based on the acceptable level of results of past inspections of the diesel generator jacket water coolers and lack of recent operational problems with the flow through the subject lines into the diesel generator jacket service water, it was deemed acceptable to have this surveillance deferred to the date indicated on Byron Maintenance Service Request 31813. This issue was resolved prior to the next execution of the surveillance.

Status:

The commitment was revised under Commitment Change Number 04-002.

Original Document:

Commitment 454-100-97-00803 "NRC Inspection Report 50/454-455-97008"

Subject of Change:

The original commitment was to revise the Byron Station Maintenance Alteration Procedure (BAP 400-9) to address the verbal commitment to the NRC that would allow chart recorders to be connected for up to 24 hours without a temporary configuration change and to ensure a person knowledgeable of the recorder and connections would be present onsite during the initial 24-hour period. The commitment was removed from MA-AA-716-100 (a corporate standard procedure that replaced the site specific BAP 400-9).

Basis:

Control of recorders (and other Measurement and Test Equipment (M&TE) is in CC-AA-112, "Temporary Configuration Changes." CC-AA-112 Attachment 2 refers to a separate commitment: NTS 455-201-98-CAQS01164 "Test Equipment Installed on Operable systems or Components." This particular commitment results in a more stringent requirement for installation of M&TE than the original commitment removed from MA-AA-716-100.

Status:

The commitment was deleted under Commitment Change Number 04-003.

Original Document:

Commitment 263266 Letter from USNRC to Commonwealth Edison Company
“Supplemental Safety Evaluation of Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2 Response to the Station Blackout Rule (TAC Nos. 68522, 68523, 68515 and 68516) dated March 14, 1991

Subject of Change:

Content of Updated Final Safety Analysis Report (UFSAR Table 8.3-5 “Loading on 4160-Volt ESF Buses.”

Commonwealth Edison Company (now Exelon Generation Company, LLC) re-evaluated the loss of offsite power (LOOP) loads and the Station Blackout (SBO) loads using equipment design requirements for the loads as opposed to overly conservative motor ratings. In addition, actual motor efficiencies rather than assumed efficiencies were used for the larger motor loads. This re-evaluation resulted in a commitment to revise UFSAR Table 8.3-5 to reflect these changes and to correct some errors that were identified during the SBO review

The original commitment is not being revised. However, the original changes to the Table 8.3-5 of the UFSAR for the commitment are being revised. The original changes to Table 8.3-5 replaced the motor rated horsepower (HP) with motor brake horsepower (BHP) based on design demand conditions.

Current actual EDG loading in table 8.3-5 is based on the results of EDG load follow studies using equipment design requirements and actual motor efficiencies. Load data from both the Loss of Coolant Accident (LOCA) and LOOP conditions defined by the table are provided.

Draft Revision Package (DRP) 9-087 revised Table 8.3-5 to show loads connected to the Emergency Diesel Generator (EDG) but the table is no longer used as a tabulation to calculate EDG loading and therefore the BHP data was eliminated with the change. (Motor rated HP is listed in the table to provide indication of the relative size of the loads.)

Basis:

During the original review of the Byron and Braidwood SBO submittal, the NRC questioned the capacity of the EDGs to operate as the AAC power source. This issue was based on the EDG loading determined from the data presented in Table 8.3-5 of the UFSAR. At that time, Table 8.3-5 contained rated HP for the loads and generic motor data, the EDG loading calculated using the table was higher than design EDG loading. The changes to Table 8.3-5 discussed in the Safety Evaluation Report (SER) were intended to revise Table 8.3-5 such that the loading provided by the table more accurately reflected EDG loading.

Table 8.3-5 was initially revised to list load BHP, but continued to use a generic efficiency and power factor for the motors. In addition, system losses were not accounted for using the load tabulation provided in Table 8.3-5. Therefore, the changes originally made to Table 8.3-5, still did not accurately reflect EDG design loading.

The changes made to Table 8.3-5 in response to the original commitment only replaced the motor rated HP with BHP based on design demand conditions. Further, the BHP values added were only for LOCA conditions, not for LOOP or SBO conditions as indicated in the SER. This data was provided as part of the SBO submittal but not incorporated into the UFSAR. Table 8.3-5 was not revised to reflect actual motor efficiencies even though the SER indicated that the revision to Table 8.3-5 was to address efficiencies in addition to horsepower changes.

Currently EDG loading is calculated using analytical software that takes into account BHP, actual motor data (efficiencies and power factors), and system losses. Since the EDG load data included in Table 8.3-5 are from load studies using motor BHP for each applicable design condition and actual motor efficiencies, the changes to Table 8.3-5 for DRP 9-087 are in accordance with the original commitment, which was to revise Table 8.3-5 to reflect accurate EDG loading based on actual motor horsepower and efficiencies.

Status:

The commitment was revised under Commitment Change Number 04-007.