

Exelon Generation Company, LLC
Braidwood Station
35100 South Route 53, Suite 84
Braceville, IL 60407-9619

www.exeloncorp.com

February 05, 2009
BW090008

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 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

Subject: Regulatory Commitment Change Summary Report

Enclosed is the Exelon Generation Company, LLC (EGC) "Regulatory Commitment Change Summary Report" for Braidwood Station. This report includes a summary of the changes processed during the period from January 1, 2008 through December 31, 2008. In addition, this report includes a description of changes processed during the period from January 1, 2001 through January 31, 2001 since it was discovered that these changes were previously not reported. Revisions to regulatory commitments made in docketed correspondence were processed using the Nuclear Energy Institute's (NEI) 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," dated July 1999 and applicable procedures.

Should you have any questions concerning this report, please contact Mr. David Gullott, Regulatory Assurance Manager, at (815) 417-2800.

Respectfully,



Bryan Hanson
Site Vice President
Braidwood Station

Attachment: Regulatory Commitment Change Summary Report

**Attachment
Braidwood Station
Regulatory Commitment Change Summary Report**

Commitment Change Tracking Number: 2001-01

Originating Document:

Letter from H.E. Bliss to U.S. NRC, "Response to Inspection Reports Nos. 50-456/88011 and 50-457/88013," dated May 12, 1988.

Subject of Change:

Delete the requirement for a guidance document on the Control Power System that identifies equipment powered from each point in the 120-Volt Distribution System based on the adequacy of controls in the current Out of Service (OOS) process and availability of electrical drawing information in the Electronic Work Control System (EWCS).

Original Commitment:

The original regulatory commitment was made in response to a Notice of Violation for failure to take proper action when two Non-accessible Exhaust Filter Plenums were inoperable. The cause of the event was determined to be an administrative and management deficiency in that the personnel assigned the task of determining and verifying the isolation points for the control power to the Auxiliary Building Ventilation System lacked the expertise and adequate reference material required to perform the function. In response to the Notice of Violation, Commonwealth Edison (currently Exelon Generation Company, LLC (EGC)) committed to develop a guidance document on the Control Power System that would identify equipment powered from each point in the 120-Volt Distribution System (i.e., identification of what equipment will be de-energized if a specific breaker/relay/fuse is removed from service).

Revised Commitment:

Adequate controls have been built into the OOS process to ensure OOS scopes are accurate and well defined. Current electrical print information is updated, maintained and available through EWCS controlled documents. As a result, no additional procedural guidance is required to be maintained.

Basis:

The OOS Program provides specific directions for OOS preparation and approval for Technical Specification (TS) and safety related activities. The required preparation and independent review by licensed operators for TS and safety related equipment OOS ensure the OOS does not impact the operability of other required equipment. The specific duties of the OOS preparer, approver and authorizers ensure an adequate condition prior to hanging a new OOS. The OOS process requires the OOS to include current/approved drawings and information relative to the isolation points. The OOS procedure contains impact review checklists for preparation, approval and authorization prior to hanging an OOS. These actions require verification of Limiting Condition for Operation (LCO) and administrative requirements to ensure applicable LCO requirements are entered as a result of circuit manipulation.

**Attachment
Braidwood Station
Regulatory Commitment Change Summary Report**

Commitment Change Tracking Number: 2001-02

Originating Document:

Letter from T.R. Tramm to U.S. NRC, "Post Accident Sampling System," dated January 5, 1984.

Subject of Change:

Revise the frequency for training all radiation-chemistry technicians on the Post Accident Sampling System (PASS) from at least every six months to annually with the content determined by the Chemistry Curriculum Review Committee.

Original Commitment:

The regulatory commitment documented in the above referenced correspondence requires special retraining on PASS to be completed by all radiation-chemistry technicians at least every six months.

Revised Commitment:

The commitment change completed in 2001 revised the original regulatory commitment to conducting annual PASS training with the content determined by the Chemistry Curriculum Review Committee. At that time, conducting annual training would have been consistent with Updated Final Safety Analysis Report (UFSAR) Section E.21.1.2.1.2. Subsequent to the commitment change completed in 2001, the licensing basis for the PASS was revised. The PASS requirements were removed from Technical Specifications in accordance with Braidwood Technical Specification Amendment No. 137 issued on May 26, 2005. The PASS licensing basis described in the UFSAR was revised accordingly and the requirement to perform PASS training deleted.

Basis:

The change in frequency of conducting PASS training from at least every six months to annually was based on the following: 1) the technicians are familiar with the sample system because it is used for routine sampling, 2) the frequency of panel use is twice as often because the number of technicians was reduced, and 3) the sample system is not safety related nor is it required for mitigating plant conditions.

Subsequently, the requirements for PASS were deleted and training is no longer required.

**Attachment
Braidwood Station
Regulatory Commitment Change Summary Report**

Commitment Change Tracking Number: 2001-03

Originating Document:

Letter from G.L. Alexander to U.S. NRC, "Supplemental Response to Generic Letter No. 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events,"" dated August 21, 1985.

Subject of Change:

Delete the original commitment to perform a trend analysis following each refueling outage after reactor trip breaker maintenance to determine whether the frequency may be increased, reduced, or remain the same for the reactor trip breakers.

Original Commitment:

For each refueling outage after reactor trip breaker maintenance, prior to unit start-up, the Braidwood Technical Staff will perform a trend analysis on the 4 parameters from item 4.2.2 (i.e., undervoltage trip attachment dropout voltage, trip force, breaker response time for undervoltage trip, and breaker insulation resistance). Based on the results of the parameter review and trend analysis, the maintenance frequency may be increased, reduced, or remain the same for the reactor trip breakers.

Revised Commitment:

The original commitment is deleted based on implementation of the Maintenance Rule.

Basis:

This commitment was made before the Maintenance Rule was enacted, i.e., 10 CFR 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants." With the rule in effect, the commitment above becomes a redundant action and does not allow for flexibility in trending. The intent of the original commitment is met through the Maintenance Rule.

**Attachment
Braidwood Station
Regulatory Commitment Change Summary Report**

Commitment Change Tracking Number: 2008-01

Originating Document:

Letter from T.J. Tulon to U.S. NRC, "Regulatory Commitment Change Summary Report," dated February 4, 2000.

Subject of Change:

Delete the revised commitment to include overtime controls and guidelines to meet the requirements of Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours," in procedure RS-AA-119.

Original Commitment:

The original commitment was contained in a letter from K.L. Kaup to U.S. NRC, dated October 4, 1994 and was associated with an allegation regarding excessive overtime. The original commitment stated that BwAP 100-7, "Overtime Guidelines for Station Personnel," would be revised to properly reflect the requirement of the current revision of NOD OA.13. The original commitment was subsequently revised in the referenced Regulatory Commitment Change Summary Report to state that the requirements previously stated in NOD OA.13, originally documented in BwAP 100-7, are now incorporated in RS-AA-119, "Overtime Controls."

Revised Commitment:

The revised commitment is deleted.

Basis:

The revised commitment is deleted based on the current procedure, LS-AA-119, "Overtime Controls," providing the appropriate current regulatory guidance (i.e., Generic Letters 82-12 and 83-14). The guidance for overtime controls will be revised as necessary upon implementation of the new rule regarding work hour limitations (i.e., 10 CFR 26, "Fitness for Duty," Subpart I, "Managing Fatigue").