



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 22, 2009

Mr. Charles G. Pardee
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2, AND BYRON STATION, UNIT NOS. 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION RELATED TO DELETION OF E BAR DEFINITION AND REVISION TO REACTOR COOLANT SYSTEM SPECIFIC ACTIVITY TECHNICAL SPECIFICATION (TAC NOS. ME0206, ME0207, ME0208, AND ME0209)

Dear Mr. Pardee:

By letter to the Nuclear Regulatory Commission (NRC) dated December 4, 2008, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML083390706), as supplemented by letter dated July 27, 2009 (ADAMS Accession No. ML092090437), Exelon Generation Company, LLC (the licensee), submitted a license amendment request to revise Technical Specifications (TSs) 1.1, "Definitions," and 3.4.16, "RCS [Reactor Coolant System] Specific Activity," and Surveillance Requirements 3.4.16.1 and 3.4.16.3. The proposed changes would replace the current TS 3.4.16 limit on RCS gross specific activity with a new limit on RCS noble gas-specific activity.

The NRC staff is reviewing your submittals, and has determined that additional information is required to complete its review. The specific information requested is addressed in the enclosed Request for Additional Information (RAI). The RAI was discussed with your staff on October 21, 2009, and they agreed to respond within 45 days after the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1547.

Sincerely,

A handwritten signature in black ink that reads "Marshall J. David".

Marshall J. David, Senior Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN-456, STN-457,
STN 50-454, and STN 50-455

Enclosure:
Request for Additional Information

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REQUEST FOR ADDITIONAL INFORMATION

BRAIDWOOD STATION, UNITS 1 AND 2

AND BYRON STATION, UNIT NOS. 1 AND 2

DOCKET NOS. STN 50-456, STN 50-457

STN 50-454, AND STN 50-455

The Nuclear Regulatory Commission (NRC) staff is reviewing Exelon Generation Company, LLC's (the licensee's) license amendment request (LAR) dated December 4, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML083390706), as supplemented by letter dated July 27, 2009 (ADAMS Accession No. ML092090437). The LAR requests to revise Technical Specifications (TSs) 1.1, "Definitions," and 3.4.16, "RCS [Reactor Coolant System] Specific Activity," and Surveillance Requirements (SRs) 3.4.16.1 and 3.4.16.3. The requested changes would replace the current TS 3.4.16 limit on RCS gross specific activity with a new limit on RCS noble gas-specific activity. The LAR states that the changes are consistent with NRC-approved TS Task Force (TSTF) Change Traveler, TSTF-490, Revision 0, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec." The NRC staff has determined that following additional information is required to complete its review.

In the LAR, the licensee proposed TS changes to revise Limiting Condition for Operation (LCO) 3.4.16, "RCS Specific Activity," APPLICABILITY requirements to specify that the LCO is applicable in MODES 1, 2, 3, and 4. In the LAR, the licensee also proposed to revise SR 3.4.16.1 to add the following NOTE, "Only required to be performed in MODE 1," thus removing the applicability of this SR to other MODES.

The NRC staff has a concern about the proposed addition of the Note to SR 3.4.16.1. The proposed change revises the conditions for sampling for SR 3.4.16.1, and may exclude sampling during the plant conditions where LCO 3.4.16 may be exceeded. After transient conditions (i.e. reactor trip, plant depressurization, shutdown or startup) that end in MODES 2, 3 or 4, the SR is not required to be performed. Radioactivity spiking and fuel failures are more likely during transient conditions than during steady state plant operations.

Because LCO 3.4.16 could potentially be exceeded after plant transient or power changes, please justify why sampling is no longer needed in the plant MODES that are proposed to be eliminated and justify how the LCO 3.4.16 remains consistent with the design bases analysis from which the LCO limits are derived (i.e. main steamline break, steam generator tube rupture, etc.). Furthermore, please justify why there is an apparent disparity between the modes of applicability (MODES 1, 2, 3, and 4) and the limited mode (MODE 1) under which the surveillance is required.

ENCLOSURE

October 22, 2009

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/RA/
Marshall J. David, Senior Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN-456, STN-457,
STN 50-454, and STN 50-455

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