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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: 2010 Regulatory Commitment Change Summary Report

Enclosed please find the "Regulatory Commitment Change Summary Report" for Byron Station. This report contains summary information from January 1 through December 31, 2010. Revisions to docketed regulatory commitments were processed using the current revision of Nuclear Energy Institutes' document NEI 99-04 "Guidelines for Managing Nuclear Regulatory Commission (NRC) Commitment Changes."

If you have any questions concerning this report, please contact D. Gudger, Regulatory Assurance Manager at (815) 406-2800.

Respectfully,



Daniel J. Enright
Site Vice President
Byron Station

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Enclosure

ATTACHMENT

BYRON STATION

REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2010

Original Document and Commitment:

Commitment AR 8405 – The NRC required compliance to NUREG 0612 “Control of Heavy Loads at Nuclear Power Plants.” Byron Station Procedure BFP FH-30 was revised effective 06/19/96 to prohibit lifting a spent fuel shipping cask higher than 6 inches above the floor, except to change elevations or maneuver around obstacles.

Subject of Deletion:

Commitment is being deleted. Implementation of EC 367123 (dry cask storage project) to replace the FHB overhead crane with a single failure proof design meets the intent of limiting the consequences of a dropped cask by restricting cask height.

Basis:

The actions taken meet LS-AA-110, “Commitment Management”, Rev 7, justification for making the commitment no longer valid. As a result of plant changes, they are no longer applicable.

Status:

The commitment was deleted under Commitment Change Number 10-010.

ATTACHMENT

BYRON STATION

REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2010

Original Document and Commitment:

Commitment AR 919060-01 – The NRC required compliance to NUREG 0612 “Control of Heavy Loads at Nuclear Power Plants.” NUREG 0612 essentially provided two approaches to achieve risk reduction of a load drop: (1) reduce the likelihood of failure of load handling systems (i.e. make them single-failure proof), or (2) demonstrate that the consequences of failure acceptable.

Because the Fuel Handling Building (FHB) crane originally was not single-failure proof, and because Byron was able to demonstrate that the consequences of a failure was acceptable (i.e., by limiting the loads carried and by implementing admin controls on the movement of heavy loads that would limit the consequences of a failure), option 2 was chosen for compliance to NUREG 0612 (Ref: Byron SSER 5 Section 9.1.5).

To maintain option 2 while implementing the ISFSI project, it would have been necessary to demonstrate acceptable consequences of a load drop of the casks involved in the transportation of spent fuel from the SFP to the storage casks. In lieu of that, Byron has elected to change its method of compliance with NUREG 0612 to option 1, single failure proof load handling system.

Subject of Change:

Commitment is being revised. The Byron FHB crane has been designed and constructed and will be maintained as a single failure proof load handling system in accordance with the guidelines of NUREG 0554 and alternative methods described in Section 5.1.6 and Appendix C of NUREG 0612. Special lifting devices for SFP cask operations meet ANSI N.14.6-1993.

Basis:

As described In NRC RIS 2005-25, licensees may consider a change to a single failure proof load handling system that fully conforms to the guidelines of Section 5.1.6 of NUREG-0612, an approved method of safely handing heavy loads. As described in NRC RIS 2005-25, Supplement 1, special lifting devices that satisfy ANSI N14.6-1993 are consistent with the NRC Standard Review Plan (NUREG-0800) Section 9.1.5, Rev 1, and are acceptable for use in single failure proof load handling systems.

Status:

The commitment was revised under Commitment Change Number 10-011.