



Byron Generating Station

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U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555-0001

Byron Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-37 and NPF-66  
NRC Docket Nos. STN 50-454 and STN 50-455

Subject: 2018 Regulatory Commitment Change Summary Report

The purpose of this report is to provide the Exelon Generation Company, LLC (EGC) "Regulatory Commitment Change Summary Report" for Byron Station for commitment changes processed during the period from January 1, 2018 through December 31, 2018. Commitment changes are processed in accordance with Nuclear Energy Institute's (NEI) 99-04, Revision 0, "Guidance for Managing NRC Commitment Changes," dated July 1999 and associated implementing procedures. For the period from January 1, 2018 through December 31, 2018, there were two commitment changes processed in accordance with NEI 99-04, Revision 0 and associated implementing procedures requiring NRC notification.

If you have any questions concerning this report, please contact Gary Contrady, Acting Regulatory Assurance Manager at (815) 406-2496.

Respectfully,

A handwritten signature in black ink, appearing to read "Mark E. Kanavos".

Mark E. Kanavos  
Site Vice President  
Byron Generating Station

MEK/WG/rm

Attachments

**ATTACHMENT A**  
**BYRON STATION**  
**REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2018**  
**Commitment Number: 454-251-88-08500, 454-251-88-83100/ 10314, 10339**

**Original Document and Commitment:**

Byron Letter dated 11/3/88 in response to NRC Inspection Reports No 454/88016 and 455/88015

Subsection IWP-4160 of Section XI of the ASME Code states, in part, that provision be made to duplicate the measurement point for those instruments which are position sensitive. On October 3, 1988, spray painted markings were placed on each affected pump and a sign-off step was added to each applicable ASME pump surveillance, 41 procedures, requiring verification that vibration reference locations are clearly marked.

**Subject of Change:**

Delete the commitment but leave steps in the procedure.

**Justifications for Change:**

This does not meet the definition of a Regulatory Commitment due to being a specific corrective action to restore compliance with an Obligation.

**Status:**

The commitment was deleted under Commitment Change Number 18-007.

**ATTACHMENT B**  
**BYRON STATION**  
**REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2018**  
**Commitment Number: 8400-01**

**Original Document and Commitment:**

This change refers to commitments made in response to NRC Generic Letter (GL) 93-04.

The Byron Station supplemental response to Generic Letter (GL) 93-04 is provided in an Attachment to the letter from D.J. Chrzanowski (Commonwealth Edison) to U. S. NRC, "Supplemental Response to GL 93-04, 'Rod Control System Failure and Withdrawal of Rod Control Cluster Assemblies,'" dated September 16, 1993. The attachment reads as follows:

"While the assessment indicates that the licensing basis is currently satisfied, Commonwealth Edison and the Westinghouse Owners Group believe that there are measures that can be taken by utilities to make compliance with GDC 25 more clear. Those recommended modifications include a combination of Rod Control System logic cabinet changes (current order timing adjustments) and a plant surveillance."

In the letter written by M.J. Vonk (Commonwealth Edison) to U.S. NRC, "ComEd Response to RAI regarding Generic Letter 93-04, "Rod Control System Failure and Withdrawal of Rod Cluster Assemblies," dated January 11, 1995, Byron Station committed to implementation of a current order timing modification prior to startup from its next refueling outage which begins after March 14, 1995 and performance of current order timing surveillance tests.

**Subject of Change:**

This Commitment was changed to no longer be applicable to Byron Unit 1 due to installation of the Westinghouse Ovation Rod Control Logic Cabinet Digital Upgrade. The Commitment remains in effect for Unit 2.

**Justifications for Change:**

As part of the Byron Unit 1 and 2 Westinghouse Ovation Rod Control Logic Cabinet Digital Upgrade, Westinghouse has updated and provided WNA-AR-00513-CCE. Section 6.2.2 within the document evaluates the applicability of WCAP-13864 to the Rod Control Logic Cabinet digital upgrade. Section 6.2.2 states the following:

"The failures identified in WCAP-13864, "Rod Control System Evaluation Program" that resulted in single rod withdrawal (when insertion was demanded) were caused by failures in the Supervisory Logic 1 Card in the Solid State RCS Logic Cabinet. These two signals provide direction pulses to the Slave Cyclor Decoder cards to identify the direction for rod motion. The failure of these signals caused both IN and OUT directions to be enabled in the Slave Cyclor Decoders. This, in turn caused both the IN and OUT timed current orders to be output together, and the low output state takes precedence over the high output state. This caused demands for full current to take precedence over demands for no/reduced current, resulting in corrupted current orders. The Digital Rod Control System (DRCS) logic cabinet upgrade implements these functions (selection of IN or OUT) in software in a redundant controller. Within the Logic Cabinet upgrade, the current profiles for IN and OUT motion are stored in tables in the software. There

is no failure mode that can cause both tables of data to be selected and output simultaneously."

The failure modes outlined in WCAP-13864 are not applicable to the Logic Cabinet Upgrade. The additional surveillance testing recommended by NSD-TB-94-05-ADA-R0 is no longer required. Based upon this, Commitment 8400-01 was changed effective to no longer be applicable to Byron Unit 1.

**Status:**

The commitment was changed under Commitment Change Number 18-012.