



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

April 20, 1990

(Reissue, dated April 26, 1990
 to correct letter date.)

Dr. Thomas E. Murley
 Office of Nuclear Reactor Regulation
 U. S. Nuclear Regulatory Commission
 Washington, DC 20555

Attn: Document Control Desk

Subject: Byron Station Units 1 and 2
 Braidwood Station Units 1 and 2
 Application for Amendment to Facility
 Operating Licenses NPF-37/66 & NPF-72/77
NRC Docket Nos. 50-454/455 & 456/457

Dear Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison proposes to amend Appendix A, Technical Specifications of Facility Operating Licenses NPF-37 & 66/NPF-72 & 77 for Byron/Braidwood Stations. The proposed amendment revises Specification 3/4.63, Containment Isolation Valves, to delete the requirement for type C leakage testing for specified Steam Generator blowdown isolation valves and to insert a requirement for the type C leakage test for the 1/2 SI8968 safety injection valves.

The description and bases of the proposed changes are contained in Attachment A. The revised Technical Specification pages are contained in Attachment B.

The proposed changes have been reviewed and approved by both on-site and off-site review in accordance with Commonwealth Edison procedures and Technical Specifications. Commonwealth Edison has reviewed this proposed amendment in accordance with 10 CFR 50.92(c) and has determined that no significant hazards consideration exists. This evaluation is documented in Attachment C. An Environmental Assessment has been performed and is included in Attachment D.

Commonwealth Edison requests approval of this proposed amendment by September 1, 1990, in support of the second refueling outage for Byron Unit 2.

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 Add:
 RES/DSR/RPSB
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 RES/DRA/RDB/RS
 RES/ASIR/SAIO

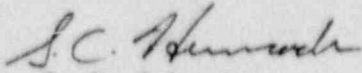
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April 20, 1990

Commonwealth Edison is notifying the State of Illinois of our application for this amendment by transmitting a copy of this letter and its attachments to the designated State Official.

Please direct any questions you may have concerning this matter to this office.

Very truly yours,


T. K. Schuster
Nuclear Licensing Administrator

/scl:0181T:17-18

Attachments: A) Description and Bases of the Proposed Changes
B) Proposed Technical Specification Changes
C) Evaluation of Significant Hazards Consideration
D) Environmental Assessment Statement Applicability Review

cc: Resident Inspector - Byron
Resident Inspector - Braidwood
P.C. Shemanski - NRR
S.P. Sands - NRR
Regional Administrator - Region III
Office Of Nuclear Facility - IDNS

ATTACHMENT A

DESCRIPTION AND BASES OF THE PROPOSED CHANGES

DESCRIPTION

The proposed changes to Technical Specification 3/4.6.3, Containment Isolation Valves, specifically Table 3.6-1, pp. 3/4 6-18 and 3/4 6-24, delete the requirement for type C leakage testing on Steam Generator Blowdown valves SD002A through H and SD005A through D, and add the requirement for type C testing for Safety Injection valve SI8968. The first proposed change is accomplished by the inclusion of an asterisk ("*") after each valve number, which references the statement "* Not subject to Type C leakage tests.". The second proposed change corrects an editorial error by removing the "*" placed after the "SI8968" valve, since type C testing is required for SI8968 and has always been done despite the referenced "*" placed by the valve.

BASES OF THE PROPOSED CHANGES

The bases for containment isolation valves Technical Specification 3/4.6.3 is that "the operability of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment." (Technical Specification 3/4.6.3 Bases, page B 3/4 6-4). The containment isolation system is designed to be consistent with the requirements of GDC 54 through 57 of Appendix A to 10CFR Part 50. Containment isolation times are also specified for the isolation valves designed to automatically close. This "ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analysis for a LOCA" as stated on page B 3/4 6-4.

Technical Specification 3/4.6.1.1, Containment Integrity, and 3/4.6.1.2, Containment Leakage, (see bases on page B 3/4 6-1) "ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leakage rates assumed in the safety analyses" and "that the total containment leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure, Pa" respectively. The type B and C leakage testing required for the containment isolation valves (that meet the criteria per 10CFR50 Appendix J and are listed in Technical Specification 3/4.6.3), ensures that containment leakage is within limits. As a result, containment integrity will be maintained in the event of an accident as outlined in the UFSAR.

In the event of a steam generator tube rupture with some leakage past the SD valves, there would be no effect on the radiological release in the analysis since the most conservative assumption of no blowdown was used to maximize the radioactive isotopes in the steam generator.

ATTACHMENT A (CONT)

The Steam Generator (SG) Blowdown lines transfer secondary side water to the SG Blowdown System (SD) for cleanup. The SG Blowdown System lines are neither a part of the Reactor Coolant System (RCS) pressure boundary nor do they open directly to the containment atmosphere under post-LOCA conditions. The intent of requiring the autoclosure of the SD valves on a containment isolation signal is to conserve the SG secondary side mass (heat sink) in the event of an accident and a phase A initiation. A future modification will add auto-closure of the SD valves on a Lo-2 SG level for the same reason, to conserve mass. The valves are not relied upon to perform a containment isolation function as described per the Technical Specification 3/4.6.3 bases, and therefore, Appendix J of 10CFR50 does not require that they be tested for type C leakage. For the same reason, the main steam isolation valves and the feedwater and auxiliary feedwater valves do not require type C testing. This was previously agreed upon and is reflected in the original Technical Specifications.

Though the SD valves do not fall into 10CFR50 Appendix J item II.H categories 1, 2, and 4 of type C testing requirements criteria for containment isolation valves, the SD valves might be used and operated intermittently under post-accident conditions (category 3 of type C testing requirement criteria for containment isolation valves). This intermittent usage would include (1) sampling SG under post-accident conditions, and (2) RCS cooldown in the event no other alternative is available.

Neither of these uses are required for the mitigation of any accident analyzed in the update Final Safety Analysis Report (UFSAR). In the event that the valves are operated intermittently under post-accident conditions, the systems that they supply flow to are designed to handle post-accident secondary water. These systems are the High Radiation Sampling System (HRSS) and the SD system via a blowdown condenser, a hotwell tank, pumps, and the blowdown demineralizer system. Processing of the blowdown would be a monitored activity and radiation monitoring on the outlet of the blowdown demineralizers would alert the operators to abnormal conditions. SG blowdown would not be initiated in the event of an accident until samples of the secondary system activity were taken and an isotopic analysis performed. This would ensure that there would be no significant radiological concerns in establishing SG blowdown. In the event that the blowdown lines needed to be isolated during sampling or blowdown, manual isolation valves in series with the SD valves would be available. The SD piping is category I safety class B up to and including the SD isolation valves. It is for the above reasons that the SD valves do not fall into any of the four (4) criteria for type C testing requirements per Appendix J item II.H of 10CFR Part 50.

The SD valves will still be functionally tested per Technical Specification 3/4.6.3 and required to be operable, in that stroke time limits and autoclosure on initiation of a phase A signal will still be required.

Other licensee's Technical Specifications do not require type C testing for SG Blowdown valves. In particular, Comanche Peak cites the basis for their exclusion as NUREG 0800 6.2.4.II.6.o, which describes a closed system in containment as qualifying for a containment isolation. This information is being provided as a reference since the Byron/Braidwood SG Secondary is also considered a closed system. For the reasons previously stated above, the SG Blowdown valves are exempt from type C testing as required for particular containment isolation valves. The description and analysis above supports the proposed change that deletes the type C testing requirement for the SD valves.

ATTACHMENT A (CONT)

The deletion of an "*" to indicate that the S18968 valves do require type C test corrects an error either typographical or editorial in nature. By deleting the "*" an additional requirement is being added to the Technical Specification. Type C testing has always been required for valves S18968 per 10CFR50 Appendix J and has always been done. With the proposed change, the Technical Specification will be consistent with the requirement for type C testing for S18968 valves.

The proposed changes will more accurately reflect the testing requirements for the SD valves while better demonstrating overall containment isolation effectiveness by the deletion of type C testing for valves where this type of testing is not required. The editorial change corrects an error in Technical Specification 3/4.6.3 whereby the actual testing requirement of valves already subjected to type C testing will be correctly indicated.

ATTACHMENT B

PROPOSED CHANGES TO APPENDIX A,
TECHNICAL SPECIFICATIONS
OF FACILITY OPERATING LICENSES NPF-37, NPF-66, NPF-72 AND NPF-77

BYRON STATION

Revised Pages: 3/4 6-18
3/4 6-24

BRAILWOOD STATION

Revised Pages: 3/4 6-18
3/4 6-24

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TABLE 3.6-1

CONTAINMENT ISOLATION VALVES

<u>PENETRATION</u>	<u>VALVE NO.</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (SEC)</u>
1. <u>Phase "A" Isolation</u>			
28	CV8100	RCP Seal Water Return	10
28	CV8112	RCP Seal Water Return	10
41	CV8152	RCS Letdown	10
41	CV8160	RCS Letdown	10
5	W0020A	Chilled Water	50
5	W0056A	Chilled Water	50
6	W0006A	Chilled Water	50
8	W0020B	Chilled Water	50
8	W0056B	Chilled Water	50
10	W0006B	Chilled Water	50
22	CC9437B*	Excess Ltdn HX Return	10
48	CC9437A*	Excess Ltdn HX Supply	10
34	FP010*	Fire Protection	12
39	IA065	Instrument Air	15
39	IA065	Instrument Air	15
13	0G079	Hydrogen Recombiner	60
13	0G080	Hydrogen Recombiner	60
13	0G082	Hydrogen Recombiner	60
13	0G084	Hydrogen Recombiner	60
23	0G081	Hydrogen Recombiner	60
23	0G085	Hydrogen Recombiner	60
69	0G057A	Hydrogen Recombiner	60
69	0G083	Hydrogen Recombiner	60
56	SA032	Service Air	4.5
56	SA033	Service Air	4.5
80	SD002C *	Steam Generator Blowdown	7.5
80	SD005B *	Steam Generator Blowdown	3.0
81	SD002D *	Steam Generator Blowdown	7.5
82	SD002A *	Steam Generator Blowdown	7.5
82	SD005A *	Steam Generator Blowdown	3.0
83	SD002B *	Steam Generator Blowdown	7.5
88	SD002E *	Steam Generator Blowdown	7.5
88	SD005C *	Steam Generator Blowdown	3.0
89	SD002F *	Steam Generator Blowdown	7.5
90	SD002G *	Steam Generator Blowdown	7.5
90	SD005D *	Steam Generator Blowdown	3.0
91	SD002H *	Steam Generator Blowdown	7.5

TABLE 3.6-1 (Continued)
CONTAINMENT ISOLATION VALVES

<u>PENETRATION</u>	<u>VALVE NO.</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (SEC)</u>
10. <u>Check (Continued)</u>			
60	SI8819C*	Safety Injection	N.A.
60	SI8819D*	Safety Injection	N.A.
66	SI8841A*	Safety Injection	N.A.
66	SI8841B*	Safety Injection	N.A.
73	SI8905B*	Safety Injection	N.A.
73	SI8905C*	Safety Injection	N.A.
55	SI8968* DELETE	Safety Injection	N.A.
34	FP345*	Fire Protection	N.A.
33	CV8368A*	RCP Seal Injection	N.A.
33	CV8368D*	RCP Seal Injection	N.A.
53	CV8368B*	RCP Seal Injection	N.A.
53	CV8368C*	RCP Seal Injection	N.A.
11. <u>S/G Safeties/PORVs</u>			
77	MS013D*	Main Steam	N.A.
77	MS014D*	Main Steam	N.A.
77	MS015D*	Main Steam	N.A.
77	MS016D*	Main Steam	N.A.
77	MS017D*	Main Steam	N.A.
78	MS013A*	Main Steam	N.A.
78	MS014A*	Main Steam	N.A.
78	MS015A*	Main Steam	N.A.
78	MS016A*	Main Steam	N.A.
78	MS017A*	Main Steam	N.A.
85	MS013B*	Main Steam	N.A.
85	MS014B*	Main Steam	N.A.
85	MS015B*	Main Steam	N.A.
85	MS016B*	Main Steam	N.A.
85	MS017B*	Main Steam	N.A.
86	MS013C*	Main Steam	N.A.
86	MS014C*	Main Steam	N.A.
86	MS015C*	Main Steam	N.A.
86	MS016C*	Main Steam	N.A.
86	MS017C*	Main Steam	N.A.
77	MS018D*	Main Steam	20
78	MS018A*	Main Steam	20
85	MS018B*	Main Steam	20
86	MS018C*	Main Steam	20

*Not subject to Type C leakage tests.

**Proper valve operation will be demonstrated by verifying that the valve strokes to its required position.

#May be opened on an intermittent basis under administrative control.

TABLE 3.6-1

CONTAINMENT ISOLATION VALVES

<u>PENETRATION</u>	<u>VALVE NO.</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (SEC)</u>
<u>1. Phase "A" Isolation</u>			
28	CV8100	RCP Seal Water Return	10
28	CV8112	RCP Seal Water Return	10
41	CV8152	RCS Letdown	10
41	CV8160	RCS Letdown	10
5	WB020A	Chilled Water	50
5	WB056A	Chilled Water	50
6	WB006A	Chilled Water	50
8	WB020B	Chilled Water	50
8	WB056B	Chilled Water	50
10	WB006B	Chilled Water	50
22	CC9437B*	Excess Ltdn HX Return	10
48	CC9437A*	Excess Ltdn HX Supply	10
34	FP010*	Fire Protection	12
39	IA065	Instrument Air	15
39	IA066	Instrument Air	15
13	@G079	Hydrogen Recombiner	60
13	@G080	Hydrogen Recombiner	60
13	@G082	Hydrogen Recombiner	60
13	@G084	Hydrogen Recombiner	60
23	@G081	Hydrogen Recombiner	60
23	@G085	Hydrogen Recombiner	60
69	@G057A	Hydrogen Recombiner	60
69	@G083	Hydrogen Recombiner	60
56	SA032	Service Air	4.5
56	SA033	Service Air	4.5
80	SD002C *	Steam Generator Blowdown	7.5
80	SD005B *	Steam Generator Blowdown	3.0
81	SD002D *	Steam Generator Blowdown	7.5
82	SD002A *	Steam Generator Blowdown	7.5
82	SD005A *	Steam Generator Blowdown	3.0
83	SD002B *	Steam Generator Blowdown	7.5
88	SD002E *	Steam Generator Blowdown	7.5
88	SD005C *	Steam Generator Blowdown	3.0
89	SD002F *	Steam Generator Blowdown	7.5
90	SD002G *	Steam Generator Blowdown	7.5
90	SD005D *	Steam Generator Blowdown	3.0
91	SD002H *	Steam Generator Blowdown	7.5

TABLE 3.6-1 (Continued)
CONTAINMENT ISOLATION VALVES

<u>PENETRATION</u>	<u>VALVE NO.</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (SEC)</u>
10. <u>Check (Continued)</u>			
60	SI8819C*	Safety Injection	N.A.
60	SI8819D*	Safety Injection	N.A.
66	SI8841A*	Safety Injection	N.A.
66	SI8841B*	Safety Injection	N.A.
73	SI8905B*	Safety Injection	N.A.
73	SI8905C*	Safety Injection	N.A.
55	SI8968* <i>DELETE</i>	Safety Injection	N.A.
34	FP345*	Fire Protection	N.P.
33	CV8368A*	RCP Seal Injection	N.A.
33	CV8368D*	RCP Seal Injection	N.A.
53	CV8368B*	RCP Seal Injection	N.A.
53	CV8368C*	RCP Seal Injection	N.A.
11. <u>S/G Safeties/PORVs</u>			
77	MS013D*	Main Steam	N.A.
77	MS014D*	Main Steam	N.A.
77	MS015D*	Main Steam	N.A.
77	MS016D*	Main Steam	N.A.
77	MS017D*	Main Steam	N.A.
78	MS013A*	Main Steam	N.A.
78	MS014A*	Main Steam	N.A.
78	MS015A*	Main Steam	N.A.
78	MS016A*	Main Steam	N.A.
78	MS017A*	Main Steam	N.A.
85	MS013B*	Main Steam	N.A.
85	MS014B*	Main Steam	N.A.
85	MS015B*	Main Steam	N.A.
85	MS016B*	Main Steam	N.A.
85	MS017B*	Main Steam	N.A.
86	MS013C*	Main Steam	N.A.
86	MS014C*	Main Steam	N.A.
86	MS015C*	Main Steam	N.A.
86	MS016C*	Main Steam	N.A.
86	MS017C*	Main Steam	N.A.
77	MS018D*	Main Steam	20
78	MS018A*	Main Steam	20
85	MS018B*	Main Steam	20
86	MS018C*	Main Steam	20

*Not subject to Type C leakage tests.

**Proper valve operation will be demonstrated by verifying that the valve strokes to its required position.

#May be opened on an intermittent basis under administrative control.

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

Commonwealth Edison Byron Station has evaluated the proposed amendment and determined that it involves no significant hazards consideration. According to 10CFR50.92(c), a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident previously evaluated; or
3. Involve a significant reduction in margin of safety.

The proposed amendment makes the following changes to Technical Specification 3/4.6.3:

1. Deletes the requirement for type C leakage testing for valves 1/2 SD002A through H and 1/2 SD005A through D by inclusion of an "*" after the above mentioned valves which references the note "*Not subject to Type C leakage tests."
2. Deletes the inclusion of an "*" by the 1/2 SI8968 valves. Thus, type C leakage testing requirements for the 1/2 SI8968 valves are indicated in the Technical Specification.

1. The probability of an occurrence or the consequence of an accident or malfunction of equipment important to safety as previously evaluated in the UFSAR is not significantly increased for the reasons as follows.

The deletion of the requirement for type C leakage testing of the steam generator blowdown system (SD) valves is not an initiating condition for any accident analysis in the UFSAR. There are two accident analyses that consider steam generator (SG) blowdown in their analysis. In the first, for the Main Steamline Rupture accident analysis in the UFSAR Table 15.1-2, the SD blowdown valves autoclosure feature is required in the accident analysis not for the mitigation, but as an assumption for the analysis. Since the SD valves will still be tested for autoclosure and stroke time when a phase A containment isolation signal is present, the above accident analysis assumption concerning SG blowdown isolation remains satisfied with the change. In the second, for the Steam Generator Tube Rupture (SGTR) accident analysis, Table 15.6-5 lists under parameters used in the SGTR analysis the initial condition of 15 gpm

ATTACHMENT C (CONT)

blowdown per SG prior to the accident and no SG blowdown during the accident. No blowdown is the most conservative assumption for the analysis to maximize the potential radiological release to the environment since all the primary to secondary leakage (radiological isotopes) would remain in the ruptured SG and would not be removed by blowdown. Thus, the proposed change would have no effect on this accident analysis since the most conservative assumption (no blowdown) was used in the analysis and the change would not affect this (any leakage past the blowdown isolation valves would decrease the inventory of radiotopes left in the ruptured steam generator that would be available for release).

The SG Blowdown system is not considered in the mitigation of any accident. With regard to the UFSAR Section 15.2 accident analyses for decreased heat sink, the auxiliary feedwater system is the means of mitigation of the accidents. Isolation of SG blowdown conserves the SG secondary side water but does not mitigate the consequence of any accident as described in the UFSAR. There is no increase, significant or otherwise, in the consequences of an accident previously evaluated in the UFSAR.

Since the secondary side of the SG is considered a closed system meeting the requirements of NUREG 0800 6.2.4.II.6.o, the proposed change would not increase, significantly or otherwise, the probability of a leakage path to the environment. Thus, the 10CFR100 limits would not be significantly affected for any accident analysis. Technical Specification limits on primary to secondary leakage and on both primary and secondary radiation levels would continue to ensure that in the event of an accident the offsite dose limit would remain within a small fraction of the 10CFR100 limits. In the event of a SGTR with some leakage past the SD valves, there would be no effect on the radiological release in the analysis since the most conservative assumption of no blowdown was used in the analysis. Any leakage past the blowdown valves would be into a blowdown system designed to handle the liquid. The Blowdown demineralizer outlet radiation monitor would alarm if leakage occurred. Various Auxiliary Building area radiation monitors would alarm on elevated radiation levels in the Auxiliary Building in the event of leakage from the SD system piping to the Auxiliary Building. As designed, the negative pressure in the Auxiliary Building and the Charcoal Booster fans and filters would ensure that the radiation would not be released to the environment. Since any leakage would be expected to be a small amount and localized in the Auxiliary Building no adverse consequences would result. There would be no significant effect on any accident analysis.

Thus, for the above reasons, the proposed change of deletion of type C testing for the SD valves does not significantly increase the probability of an occurrence or the consequence of an accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

ATTACHMENT C (CONT)

The inclusion of type C testing for the SI8968 valves is a change of an editorial nature and merely corrects the Technical Specification to make it consistent with the UFSAR. The SI8968 valves have always required type C testing per 10CFR50 Appendix J, and the testing has always been done. For this reason, the change does not significantly increase the probability of an occurrence or the consequence of an accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created.

The SD system is Category 1 Safety Class B piping up to and including the isolation valves, and has manual isolation valves. With respect to the accident analysis in Section 15.2 of the UFSAR where there is a decrease in the heat removal by the secondary system, SG blowdown isolation is not required to mitigate any of the accidents in the analysis. Auxiliary feedwater initiation mitigates the accidents. The amount of leakage is insignificant with respect to the total SG secondary water mass. Though the SD isolation valves do autoclose on a phase A containment isolation signal to conserve SG secondary side mass, this is not required to mitigate the effects of any accident in the UFSAR. No other accident or malfunction would be created. Thus, the possibility for an accident or malfunction of a different type than any previously created in the UFSAR is not created.

The change to include the type C leakage test for SI8968 valves does not create the possibility for an accident or malfunction of a different type than any previously analyzed, since the change is of an editorial nature and reflects the type of testing already done since it has been required.

3. The margin of safety as defined in the basis for any Technical Specification is not significantly reduced.

Pursuant to NUREG 0800 6.2.4.II.6.0 the SG secondary is a closed system and therefore does not meet the 10CFR50 Appendix J criteria for type C leakage testing. That is, no direct path would exist from containment to the outside atmosphere which might result in a radiological release to the environment and as such, satisfies its containment isolation function without type C testing requirements. Technical Specification limits on primary to secondary leakage and both primary and secondary radiation limits ensure that in the event of an accident (in particular, a SGTR), the offsite dose limits would be only a small portion of the 10CFR100 limits. The containment isolation function of the SD valves is to conserve the SG secondary side mass in the event of an accident. Surveillances to verify autoclosure and stroke time ensure that the SD valves are functionally operable. The bases for containment isolation valves Technical Specification 3/4.6.3, is that "the operability of the containment isolation valves ensures that the containment atmosphere will be isolated from

ATTACHMENT C (CONT)

the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment." (Technical Specification 3/4.6.3 Bases p. B 3/4 6-4). This would be satisfied with the proposed change. Thus, the margin of safety as defined in the bases for any Technical Specification is not significantly reduced.

The change to require type C testing for the SI8968 valves is of an editorial nature and does not reduce the margin of safety as defined in the basis for any Technical Specification.

Therefore, based on the above evaluation, Commonwealth Edison believes that these changes do not involve a significant hazards consideration.

ATTACHMENT D

ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

Commonwealth Edison has evaluated the proposed amendment against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21. The proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9) in that:

1. The proposed amendment involves no significant hazards consideration (See Attachment C);
2. There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and
3. There is no significant increase in individual or cumulative occupational radiation exposure.

Pursuant to 10CFR51.22(b), no environmental assessment or environmental impact statement is required with the issuance of the proposed amendment.