



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

June 4, 1990

Dr. Thomas E. Murley, Director  
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, NPF-66, NPF-72 and NPF-77  
Appendix A, Technical Specifications  
NRC Docket Nos. 50-454, 50-455, 50-456, and 50-457

Reference: (a) November 30, 1988, S.C. Hunsader letter to  
T.E. Murley

(b) May 30, 1990, S.C. Hunsader letter to  
T.E. Murley

Dear Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison (Edison) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF-37, NPF-66, NPF-72 and NPF-77. The proposed amendment requests a change to Technical Specification 4.0.2 and its associated bases, based on the guidance in Generic Letter 89-14, to remove the 3.25 times the original surveillance interval limitation for consecutive surveillances.

In reference (a) Edison had provided a proposed Technical Specification amendment, in accordance with the guidance of Generic Letter 87-09. Reference (b) provided supplemental information in response to a request of the NRC Staff. In accordance with the guidance of Generic Letter 87-09, changes were made to the wording of the bases for Specification 4.0.2, and these are currently under NRR review.

However, in accordance with the guidance given in Generic Letter 89-14, the changes, made in this amendment request, provide new changes to the wording of the bases of Specification 4.0.2. These new changes supersede the changes requested in reference (a) and take precedence.

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Edison's proposed amendment request is subdivided as follows:

1. Attachment A gives a summary of the changes proposed in the amendment.
2. Attachment B provides the Safety Evaluation and Environmental Assessment.
3. Attachment C describes Edison's evaluation performed in accordance with 10 CFR 50.92(c), which has determined that no significant hazards considerations exist.
4. Attachment D includes the marked-up Technical Specification pages with the requested changes indicated.

Edison is notifying the State of Illinois of this application for 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 submittal to this office.

Very truly yours,

*S.C. Hunsader*  
S.C. Hunsader  
Nuclear Licensing Administrator

Att.'s: A) Summary of Proposed Changes  
B) Safety Evaluation and Environmental Assessment  
C) Evaluation of Significant Hazards Considerations  
D) Marked-up Technical Specification Pages

Enclosures: GL 89-14

cc: Resident Inspector-Byron  
Resident Inspector-Braidwood  
P. Shemanski-NRR  
S.P. Sands-NRR  
W. Shafer-RIII  
M.C. Parker-IDNS

ATTACHMENT A

SUMMARY OF PROPOSED CHANGES TO APPENDIX A

TECHNICAL SPECIFICATIONS OF

FACILITY OPERATING LICENSES NPF-37, NPF-66, NPF-72 AND NPF-77

The proposed change is based on the guidance provided in Generic Letter 89-14, Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals. The current Byron and Braidwood Technical Specification 4.0.2 allows a surveillance interval to be extended by up to 25 percent of the interval. However, the combined interval for any three consecutive surveillances cannot exceed 3.25 times the original surveillance interval. This Technical Specification change request seeks to remove the 3.25 limitation for consecutive surveillances. The revised specification would allow a maximum of 25 percent extension for each surveillance period.

The intent of this change is to not increase the time between the performance of surveillances. Rather, the purpose of this change is to allow for more operational flexibility when scheduling surveillances. This flexibility will allow surveillances to be performed when plant conditions are appropriate for the testing. In particular, this flexibility will help accommodate surveillances that must be done during refueling outages. The intent of this change is stated in the revised Bases section for Specification 4.0.2.

The proposed wording for both Specification 4.0.2 and its bases was taken directly from Generic Letter 89-14. No exceptions to the guidance provided in the generic letter are being requested.

ATTACHMENT B

SAFETY EVALUATION AND ENVIRONMENTAL ASSESSMENT FOR PROPOSED CHANGES

TO APPENDIX A, TECHNICAL SPECIFICATIONS OF

FACILITY OPERATING LICENSES NPF-37, NPF-66, NPF-72 AND NPF-77

SAFETY EVALUATION

Commonwealth Edison (Edison) submitted a lead-plant proposal for the LaSalle Technical Specifications (TS) to remove the 3.25 limit for surveillances that are performed during a refueling outage and are specified with an 18-month surveillance interval. After discussions with the staff, Edison amended the proposal to remove the 3.25 limitation for all surveillances. The amended proposal was approved by the NRC staff on a lead-plant basis. Consistent with NRC policy, Generic Letter 89-14 provided guidance for license amendment requests to implement this line-item improvement in TS.

Experience has shown that the 18-month surveillance interval, with the provisions to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25-percent allowance for extending surveillances that are performed on a refueling outage basis.

The use of the allowance to extend surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Examples of this include transient plant operating conditions or conditions in which safety systems are not out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25-percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit. Also, there is the administrative burden associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, the staff concluded that removal of the 3.25 limit will have an overall positive impact on safety.

ENVIRONMENTAL ASSESSMENT

Commonwealth Edison has evaluated the proposed amendment against the criteria for and identification of Licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed change meets the criteria for a categorical exclusion as provided for under 10 CFR 51.21(c)(9). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, and the change affects a surveillance requirement which involves no significant hazards considerations. There is no change in the amount or type of releases made off-site, and there is no significant increase in individual or cumulative occupational radiation exposure.

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS FOR PROPOSED CHANGES  
TO APPENDIX A TECHNICAL SPECIFICATIONS OF  
FACILITY OPERATING LICENSES NPF-37, NPF-66, NPF-72 AND NPF-77

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. According to 10 CFR 50.92(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 from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

A. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The accident analyses assume that required equipment will be operable in the event of an accident. Surveillances are performed to verify the ability of the equipment to operate as designed. Deletion of the 3.25 criteria will allow additional flexibility in the scheduling of surveillances so that they may be conducted at times when plant conditions are conducive to their performance. No change is being proposed in the surveillance frequency, and therefore, this change will have no impact on the probability of an occurrence.

The B/B UFSAR Chapter 15 analyses assume that equipment required by the proposed Specifications be capable of performing when required. The proposed change does not alter the operability requirements of any equipment. As stated in NRC Generic Letter 89-14, the most probable result of any particular surveillance is the verification of continued operability, as opposed to the detection of inoperable equipment. Additionally, the 3.25 limitation being deleted was not considered in the evaluation of the probability of consequences of accidents considered in the B/B UFSAR.

There is a slight possibility of inoperable equipment remaining undetected for slightly longer period of time than currently allowed, but this possibility arises only if the current 1.25 allowable extension is routinely utilized. The base frequency of the surveillances remains unchanged, and every effort is made to perform these surveillances as close as possible to the due date.

ATTACHMENT C (continued)

- B. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

There is no new equipment being introduced, and installed equipment is not being operated in a new or different manner. No specific attributes verified during the conduct of the surveillances are being changed or deleted.

- C. The proposed change does not involve a significant reduction in a margin of safety.

The proposed change will allow the surveillances to be performed when plant conditions are conducive to their completion. The current allowable extension of up to 25% per surveillance interval remains unchanged. The proposed change will allow the scheduling flexibility necessary to prevent a unit shutdown for the purpose of performing a surveillance. This increased scheduling flexibility will result in a net safety benefit.

Based on the above, Commonwealth Edison concludes that this change will not increase the probability or consequences of a previously analyzed accident, introduce the possibility of an accident not previously evaluated, or decrease the margin of safety. Therefore, this change does not involve a significant hazards consideration.