



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 21, 1994

Mr. William Russell, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Byron Units 1 and 2
Braidwood Units 1 and 2
Request for EMERGENCY TECHNICAL SPECIFICATION AMENDMENT
Facility Operation Licenses: NPF-37, NPF-66, NPF-72 and NPF-77
Technical Specification Section 3/4.7.1
NRC Docket Nos. 50-454, 50-455 50-456 and 50-457

Reference: D. Saccomando Letter to J. Zwolinski dated March 11, 1994,
transmitting Notice of Enforcement Discretion Pertaining to
Byron and Braidwood Station Main Steam Safety Valve

Dear Mr. Russell:

Pursuant to 10 CFR 50.91(a)(5), Commonwealth Edison Company (CECo) proposes to amend Appendix A, Technical Specifications of Facility Operating Licenses NPF-37, NPF-66, NPF-72 and NPF-77, and requests that the Nuclear Regulatory Commission (NRC) grant an EMERGENCY amendment to Technical Specification Section 3/4.7.1 "Turbine Cycle Safety Valves". Consistent with NRC guidance, a request for an NRR Notice of Enforcement Discretion (NOED) for the period until this amendment can be granted was provided in the reference letter.

Technical Specification 3.7.1.1 states that, "All main steam line code safety valves associated with each steam generator shall be OPERABLE with lift settings as specified in Table 3.7-2." The proposed amendment will allow the current as-left setpoints to be acceptable until they can be reset within the time frame described in the amendment.

At the time of issuance of the Notice of Enforcement Discretion (NOED) Braidwood Unit 2 and Byron Units 1 and 2 were operating in Mode 1. The proposed amendment would add a footnote to Table 3.7-2 which states, "Main steam line code safety valve lift settings may have a +/-3% tolerance until May 9, 1994, by which time the lift settings will be reset to +/-1%."

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In addition, at the time of issuance of the NOED, Braidwood Unit 1 was in a refuel outage. An amendment to Braidwood Technical Specification 4.7.1.1 will be necessary to facilitate resetting of the setpoints. The proposed amendment adds the statement: "The provisions of Specification 4.0.4 are not applicable for Braidwood Unit 1 Cycle 5 until the initial entry into Mode 2."

The attached safety analysis shows that this proposal will have minimal impact on safety. Amending Section 3/4.7.1 to allow for the Main Steam Safety Valve setpoint to be greater than the allowed maximum of +/-1% would not impact the safety margin, because the Main Steam Safety Valves had been previously analyzed for as-found setpoints of up +/- 3%. All valves for the four units fall within +/-3% of the nominal setpoint for the individual valve.

This emergency change could not be avoided because CECo only recently became informed of the need to reset the setpoints by the vendor.

The situation was not created by a failure to make a timely application of the Technical Specification Amendment because prior to notification from the vendor, CECo was unaware that an improper value for mean seat areas was used in calculations the Main Steam Safety Valve setpoints.

In support of this request, the following information is attached:

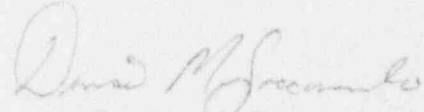
- Attachment A: Detailed Description Of The Proposed Changes
- Attachment B: Revised Technical Specification Pages
- Attachment C: Evaluation of Significant Hazards Considerations
- Attachment D: Environmental Assessment

Pursuant to 10CFR50.91(b)(1) a copy of this request has been forwarded to the designated State of Illinois Official.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other CECo employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Please address any comments or questions regarding this matter to this office.

Respectfully,



Denise M. Saccomando
Nuclear Licensing Administrator

Attachments

cc: R. Assa, Braidwood Project Manager - NRR
G. Dick, Byron Project Manager - NRR
S. Dupont, Senior Resident Inspector - Braidwood
H. Peterson, Senior Resident Inspector - Byron
B. Clayton, Branch Chief - Region III
Office of Nuclear Facility Safety - IDNS

Maryellen D. Long 3/21/94



ATTACHMENT A

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

DESCRIPTION OF THE PROPOSED CHANGE

Commonwealth Edison Company proposes a one time revision to Turbine Cycle Safety Valve Technical Specification 3.7.1.1 Surveillance Requirements and Technical Specification 3.7.1.1 Table 3.7-2.

The proposed Technical Specification Revisions include:

1. Adding a statement to the Surveillance Requirements stating that the provisions of Specification 4.0.4 are not applicable for Braidwood Unit 1 Cycle 5 until the initial entry into MODE 2.
2. Adding a provision to Table 3.7-2 allowing main steam line Code safety valve lift settings to have a $\pm 3\%$ tolerance until May 9, 1994, by which time the lift settings will be reset to $\pm 1\%$.

The revised Technical Specification pages indicating the proposed changes are provided in Attachment B. A discussion of the proposed changes follows.

Description and Bases of the Current Requirement

The Main Steam Safety Valves (MSSV) are currently required to be set within a lift setting tolerance of $\pm 1\%$. Technical Specification 3.7.1.1 Action Statement "a" states that with one or more MSSVs inoperable, operation in MODES 1, 2, and 3 may proceed provided the valve is restored to OPERABLE status or the Power Range High Flux trip setpoints are reduced within 4 hours. If these requirements are not met, the plant is required to be in HOT STANDBY in 6 hours and COLD SHUTDOWN in the next 30 hours.

The safety valves limits secondary pressure to within 110% of design pressure of 1200 psia during the most severe anticipated operating transient (Turbine Trip at 102% Rated Thermal Power with no steam dumps available).

Description and Bases of the Requested Revision

At about 1730 hours on March 9, 1994, Braidwood System Engineering received a phone call from Furmanite Company indicating that an improper value for mean seat area was used in the Trevitest calculation for main steam safety valve setpoints. Additional phone calls on March 10, 1994, and a letter from Furmanite revealed that the scope of the concern also included Byron Station. Calculations to determine the as-left condition of the MSSVs for each unit based on the revised mean seat area were completed at approximately 1500 hours on March 10, 1994. Results indicate that 16 valves for Byron Unit 1, 19 valves for Byron Unit 2, and 17 valves each for Braidwood Units 1 and 2 fall outside of the Technical Specification requirement of $\pm 1\%$. All valves for the four Units fall within $\pm 3\%$ of the nominal setpoint for the individual valves.

The proposed emergency Technical Specification amendment will allow the current as-left setpoints for Braidwood Unit 2, and Byron Units 1 and 2 to be acceptable until they can be reset. It allows Braidwood Unit 1, currently in refueling outage, to reach MODE 3 to reset the valves. Based upon unit operating schedules and Furmanite availability, the safety valves for Braidwood Unit 2, and Byron Units 1 and 2 will be reset on or before May 9, 1994. The valves for Braidwood Unit 1 will be reset prior to reaching MODE 2 following the current refueling outage.

Impact of the Changes

The requested changes to Specification 3.7.1.1 due to the as-left setpoints of the MSSVs being greater than the allowed maximum of $\pm 1\%$ but within $\pm 3\%$ do not impact the safety margin. The MSSVs are analyzed for as-found setpoints of $\pm 3\%$, which Commonwealth Edison Company will apply for in an upcoming amendment request.

The effects of increasing the as-found lift setpoint tolerance on the MSSV have been examined, and it has been determined that, with the exception of the Loss of Load/Turbine Trip, the current accident analyses as presented in the UFSAR remain valid. The loss of load/turbine trip event was analyzed in order to quantify the impact of the setpoint tolerance relaxation. All applicable acceptance criteria for this event remain satisfied and the conclusion presented in the UFSAR remains valid.

The conclusions presented in the Overpressure Protection Report remain valid.

No operating conditions or modes will be changed as a result of this evaluation. No new failure modes have been determined to exist as a result of this new analysis. The MSSVs will continue to relieve any unlikely system overpressure during all applicable operating modes. The increased as-found setpoint tolerance has no significant negative impact on any system, operating mode, or accident analysis.

SCHEDULE REQUIREMENTS

This amendment is needed for the startup of Braidwood Unit 1. Therefore, CECO requests that this amendment be approved prior to April 17, 1994.