Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

July 19, 1994

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

Attention: Document Control Desk

Subject: Supplement to Application for Amendment to Facility Operating Licenses-Control Room Ventilation System Chiller

Byron Station Units 1 and 2
NPF-37/66; NRC Docket Nos. 50-454/455

Braidwood Station Units 1 and 2
NPF-72/77; NRC Docket Nos. 50-456/457

References: 1) D. Saccomando letter to T. Murley transmitting request to amend Technical Specification 3/4.7.6 dated August 31, 1993

2) NUREG 1431, Standard Technical Specifications for Westinghouse Plants

Dear Mr. Russell:

Reference 1 transmitted Commonwealth Edison Company's (ComEd) request to amend Technical Specification 3/4.7.6, "Control Room Ventilation System." This proposed revision would increase the allowed outage time for an inoperable Control Room chiller in Modes 1 through 4 from 7 to 30 days. In addition, the proposed change adds an optional Action statement in Modes 5 and 6 to allow cessation of core alterations, positive reactivity additions, and movement of irradiated fuel in lieu of placing the operable train of VC in makeup mode. These proposed changes are in accordance with the referenced NUREG 1431, "Standard Technical Specification for Westinghouse Plants."

During the Nuclear Regulatory Commission (NRC) review of the proposed amendment, it was noted that an additional surveillance requirement was needed to demonstrate that the Control Room Ventilation System has the capability to remove the required heat load. The attached supplemental change contains this additional surveillance and changes to the associated bases. These changes are also consistent with NUREG 1431.

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Attachment A contains a description and safety analysis of the proposed supplemental changes. Attachment B contains the supplemental changes to the proposed revision to the Technical Specifications for Byron and Braidwood Stations. Attachment C contains the revised Evaluation of Significant Hazards Consideration and supersedes the previous evaluation in its entirety. This evaluation addresses both the proposed supplemental changes and those changes submitted with Reference 1. The original Attachment D, "Environmental Assessment", which was submitted in with Reference 1, remains unchanged and therefore, is not included with this transmittal.

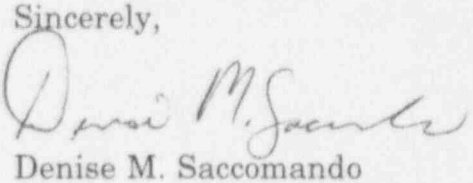
The proposed changes have been reviewed and approved by the On-site and Off-site Review Committees in accordance with ComEd procedures. ComEd has reviewed this proposed amendment in accordance with 10 CFR 50.92(c) and has determined that no significant hazards consideration exists.

ComEd is notifying the State of Illinois of our application for these amendments by transmitting a copy of this letter and the associated attachments to the designated State 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 ComEd 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 further comments or questions regarding this matter to this office.

Sincerely,



Denise M. Saccomando
Nuclear Licensing Administrator

Attachments

cc:

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

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ATTACHMENT A

DESCRIPTION AND IMPACT OF THE PROPOSED SUPPLEMENTAL CHANGES

This attachment describes supplemental changes made in support of an amendment request transmitted to the NRC in a D. M. Saccomando letter to T. E. Murley dated August 31, 1993. That request proposed to add an ACTION that would allow 30 days to restore one train of Control Room Ventilation (VC) that is inoperable only due to an inoperable chiller unit in Modes 1 through 4. If a train of VC becomes inoperable for other reasons, the allowed outage time (AOT) will remain seven days. In addition, the proposed change adds an optional Action statement in Modes 5 and 6 to allow cessation of core alterations, positive reactivity additions, and movement of irradiated fuel in lieu of placing the operable train of VC in makeup mode. The original request has a complete description and safety discussion of those changes. This supplement is providing changes that the NRC suggested during their review of the original amendment request. A review of the complete amendment request would include the original submittal and this supplement.

Description and Basis of Current Requirement

Technical Specification Surveillance 4.7.6 lists several requirements to verify operability of the VC systems. The operability of these systems ensures that: 1) the ambient air temperature does not exceed the allowable temperature for the continuous duty rating of the equipment and instrumentation cooled by this system, and 2) that the control room will remain habitable for operations personnel during and following all credible accident conditions. There is currently no surveillance requirement in the Technical Specifications that explicitly verifies that each VC train has the capability to remove the required heat load.

Description and Basis of the Proposed Change

Commonwealth Edison (ComEd) is proposing to add a surveillance requirement, 4.7.6.k, to the Control Room Ventilation Technical Specification. The surveillance requirement ensures that each Control Room Ventilation System is demonstrated operable:

> "At least once per 18 months by verifying that each Control Room Ventilation System has the capability to remove the required heat load."

Also, the Basis of Technical Specification 3.7.6 will be modified to include the following additional information:

> "The surveillance requirement to verify that each control room ventilation system has the capability to remove the required heat load, as determined by the original heat capacity verification test, consists of a combination of testing and calculations. The 18 month frequency is appropriate since significant degradation of the control room ventilation system is slow and not expected over this time period."

This change is requested based on comments from the NRC during their review of the amendment that proposed to extend the LCO to restore one train of the Control Room Ventilation System, which is inoperable only due to an inoperable chiller unit, from 7 to 30 days. This request supplements the original amendment request.

Impact of the Proposed Change

The proposed surveillance is consistent with Standard Technical Specifications for Westinghouse Plants (NUREG-1431). The proposed wording for the Basis is based on NUREG-1431. The surveillance will consist of a combination of testing and calculations to verify that the heat removal capability of the Control Room Ventilation System is sufficient to remove the required heat load.

The addition of a Technical Specification surveillance to monitor the VC system heat removal capability will ensure that system function and integrity are maintained. No changes are being made to the design or to the assumptions in the design basis analyses.

Schedule Requirements

The proposed change has no impact on plant operation or system monitoring and is made in support of an amendment request dated August 31, 1993. The original request would allow 30 days to restore one train of VC that is inoperable only due to an inoperable chiller unit. Byron and Braidwood are developing an extensive VC Chiller preventative maintenance program that includes work that will require more than the current allowed outage time of seven days. ComEd therefore requests that the amendment be approved as soon as possible to allow performing the necessary preventative maintenance without requiring the unit to be in cold shutdown.