Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

July 6, 1994

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

Attention: Document Control Desk

Subject: Application for Amendment to Facility Operating Licenses:

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)

"Steam Generator Tube Sleeving Methodology"

Reference: R. Assa letter to D. Farrar transmitting Safety Evaluation for Steam Generator Tube Sleeving dated March 4, 1994

Dear Mr. Russell,

Pursuant to 10 CFR 50.90, Commonwealth Edison Company (ComEd) proposes to amend Appendix A, Technical Specifications of Facility Operating Licenses NPF-37, NPF-66, NPF-72, and NPF-77. The proposed amendment request revises Technical Specification 3/4.4.5, "Steam Generators", and the associated bases. In the Reference letter, Byron and Braidwood were granted amendments to their Technical Specification which authorized the use of the sleeving process. That amendment cited specific references to NRC approved technical reports. This amendment request which incorporates an editorial change, removes specific vendor Technical Report references, and states the reports in generic terms. This amendment requests allows ComEd to use advanced NRC approved sleeving processes, and also precludes unnecessarily burdening the Nuclear Regulatory Commission (NRC) with additional amendment requests as new methodologies are perfected for steam generator sleeving processes.

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The amendment request is subdivided as follows:

Attachment A: Description and Safety Analysis of Proposed Changes

Attachment B: Proposed Revision to the Technical Specifications

Attachment C: Evaluation of Significant Hazards Considerations

Attachment D: Environmental Assessment

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.

ComEd requests that this proposed amendment, which is editorial in nature be given an expeditious review and approval prior to September 9, 1994. Approval of this amendment package would allow Byron to use advanced, NRC approved sleeving processes during the upcoming Unit 1 fall refueling outage.

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 further comments or questions regarding this matter to this office.

Sincerely,

Denise M. Saccomando
Nuclear Licensing Administrator

Attachments

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

OFFICIAL SEAL
MARY JO YACK
NOTARY PUBLIC STATE OF ILLINOIS
MY COMMISSION EXPIRES: 11/29/97

Mary Jo Yack 7-6-94

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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

1. Description of the Proposed Change

Commonwealth Edison Company (ComEd) requests to amend Technical Specifications (TS) 3.4.5 "Steam Generators" and the associated bases by removing specific vendor Technical Report references. As the current Westinghouse and Babcock & Wilcox (B&W) sleeving processes are upgraded, new Technical Reports will be issued. Under the current Technical Specification, if the new methodology is found acceptable by the NRC Technical Review Staff, ComEd would be required to submit another amendment package, requesting authorization to use the improved process. Removing specific references to Technical Report revisions and identifying the reports in generic terms will allow ComEd the option to use advanced processes after NRC approval, subject to any limitations and restrictions noted by the NRC staff. This change will also preclude unnecessarily burdening the NRC with additional amendment requests as new methodologies are perfected for steam generator (SG) sleeving processes.

Additionally, this amendment request contains an editorial change when referencing Babcock & Wilcox Nuclear Service Company. This change refers to the vendor as Babcock & Wilcox Nuclear Technologies (BWNT).

Copies of the Technical Specification and bases page with the changes indicated are included in Attachment B of this submittal.

2. **Description of Current Requirements:**

The current requirements identified in Technical Specifications Section 3/4.4.5 "Steam Generators" allows the use of the sleeving processes approved in Westinghouse report WCAP-13698 Rev.1 and B&W Topical Report BAW-2045PA Rev.1. The tube repair processes described in the specified vendor Technical Reports are referenced in the Surveillance Requirements, "Acceptance Criteria" and associated bases for the Byron and Braidwood Steam Generators in Technical Specification amendments 58 and 50, respectively.

3. **Bases for the Current requirements:**

The approved sleeving processes for Byron and Braidwood are described in Westinghouse report WCAP-13698 Rev.1 and B&W Topical Report BAW-2045PA Rev.1. The methodologies discussed in these Technical Reports and the additional actions specified in the Byron and Braidwood Technical Specification amendments 58 and 46, respectively, are the alternate tube repair methods authorized for Byron and Braidwood. The Technical Reports describe the Westinghouse laser weld and the B&W kinetic welded sleeving methods currently approved by the Staff. Based on the techniques described in the Technical Reports Byron and Braidwood were authorized to use these sleeving processes.

4. **Description of the Need for Amending the Technical Specifications:**

Byron and Braidwood are requesting a generic wording change when referring to the vendor Technical Reports in the TS 3/4.4.5.4 "Acceptance Criteria" and the associated bases. Changing the acceptance criteria to reference the current NRC approved Westinghouse and BWNT Technical Reports will reduce the burden and expense for Byron and Braidwood by eliminating the need for additional amendment requests. In referencing the current NRC approved Technical Report, the burden on the NRC Technical Review staff for review of additional amendment requests can also be minimized. As new methodologies are developed for the Westinghouse and BWNT sleeving processes, ComEd will have the option to use the advanced process after NRC approval, subject to any limitations and restrictions noted by the NRC staff.

Another editorial change is requested to refer to Babcock & Wilcox Nuclear Service Company as Babcock & Wilcox Nuclear Technologies.

5. Description of the Proposed Amendment:

Specification 4.4.5.4, Steam Generator Acceptance Criteria

Current Specification:
a. 10)

a) "Laser welded sleeving as described by Westinghouse Report WCAP-13698, Rev.1, or"

Replace with:

"Laser welded sleeving as described in a Westinghouse Technical Report currently approved by the NRC, subject to the limitations and restrictions as noted by the NRC staff, or"

Current Specification:

a. 10)

b) "Kinetic welded sleeving as described by Babcock & Wilcox Topical Report BAW-2045PA, Rev.1."

Replace with:

"Kinetic welded sleeving as described in a Babcock & Wilcox Nuclear Technologies Technical Report currently approved by the NRC, subject to the limitations and restrictions as noted by the NRC staff."

Bases for 3/4.4.5, Steam Generators

In the bases section, an editorial change is required to eliminate the reference to a specific Technical Report approved by the NRC. This change will delete the Westinghouse WCAP-13698 Rev.1 and the B&W Topical Report BAW-2045PA Rev.1 references in the second and third paragraphs. The references will be replaced with the generic words used in Insert "C". This change will assist Byron and Braidwood in minimizing the duplication effort and expense of submitting additional amendment requests.

6. Bases of the Proposed Amendment:

The Steam Generator sleeving processes approved by the NRC for Byron and Braidwood stations currently specify a distinct vendor Topical Report. As advances in sleeving processes are made, Byron and Braidwood would be required to submit additional TS changes in order to use these new techniques. Changing the TS "Acceptance Criteria" to reference the current NRC approved Westinghouse and BWNT Technical Reports can reduce this burden and expense for Byron and Braidwood. Also the burden on the NRC staff can be reduced by eliminating additional amendment requests requiring review as new methodologies are developed for the sleeving processes.

7. Impact of the Proposed Change:

The original amendment requested approval of Steam Generator sleeves installed using the Westinghouse process (laser welded joints) or the B&W process of kinetically welded joints. The current requirements identified in Technical Specifications section 3/4.4.5 "Steam Generators" allow the use of the sleeving processes approved in Westinghouse report WCAP-13698 Rev.1 and B&W Topical Report BAW-2045PA Rev.1. Referencing the current NRC approved Westinghouse or BWNT Sleeving Technical Reports subject to the limitations and restrictions as noted by the NRC, has no effect upon design transients and accident analyses.

The implementation of the proposed tube repair method does not introduce significant or adverse changes to the plant design basis. Use of laser welded or kinetically welded sleeving processes approved by the NRC will continue to maintain the overall tube bundle structural integrity at a level consistent with that of the originally supplied tubing during all plant conditions.

Based on the above, the proposed amendment request has no significant negative impact on any system or operating mode.

8. Schedule Requirements:

Byron and Braidwood have been authorized to use the sleeving processes from Westinghouse and BWNS in Technical Specification amendments 58 and 46, respectively. ComEd requests this supplemental amendment be given an expeditious review and approval prior to September 9, 1994. This would allow the use of any advanced technological improvements in the sleeving processes during the upcoming Byron Unit 1 refueling outage.