

Commonwealth Edison One First National Plaza, Chicago, Illinois Address Reply to: Post Office Box 767 Chicago, Illinois 60690

October 3, 1984

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.s. Nuclear Regulatory Commission Washington, D. C. 20005

SUBJECT: Byron Generating Station Units 1 and 2, Technical Specifications, NRC Docket Nos. 50-454 and 50-455

Dear Mr. Denton:

The continuing review of the Byron Station Technical Specifications has identified additional changes as noted on the enclosed attachments. It is requested that these changes be incorporated into the final draft of the Technical Specifications dated August 27, 1984, from B.J. Youngblood to D. Farrer.

Very thuly yours

Dennis L. Farrar Director, Nuclear Licensing

cc: Byron Resident Inspector Senior Tech Spec Coordinator Calvin Moon

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Byron Station proposes to modify Technical Specification 3/4.7.5 "Ultimate Heat Sink" as indicated on the attached page.

JUSTIFICATION

These revisions are requested based on discussions held on 9/27/84 between Gary Staley (NRC - Environmental and Hydrologic Engineering Branch) and Sargent & Lundy Engineering concerning Minimum Rock River flow and corresponding Rock River level.

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FINAL DRAFT

PLANT SYSTEMS

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3/4.7.5 ULTIMATE HEAT SINK

LIMITING CONDITION FOR OPERATION

- 3.7.5 The ultimate heat sink (UHS) shall be OPERABLE with:
 - a. An essential service water pump discharge water temperature of less than or equal to 98°F, and
 - b. A minimum Rock River water level at or above feet Mean Sea Level, USGS datum, at the Byron Screenhouse, with two essential service water make-up pumps OPERABLE, and
 - c. Two deep wells OPERABLE with the Rock River water level at or above 702 feet Mean Sea Level USGS datum, at the Byron Screenhouse.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the essential service water pump discharge water temperature not meeting the above requirement, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the minimum Rock River water level not meeting the above requirement be in at least Hor Stanboy within the best 6 hours and in BOLD SHOROOM with in the following 30 hours.
- c. With only essential service water make-up pump OPERABLE restore two essential service water make-up pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- COLD SHUTDOWN within the following 30 hours.
 d. With one deep well inspectable, restore beth deep wells to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.5.1 The UHS shall be determined OPERABLE at least once per 24 hours by verifying the essential service water pump discharge water temperature and the Rock River water level to be within their limits.

4.7.5.2 The deep wells shall be demonstrated OPERABLE:

- a. At least once per 31 days by starting each pump and operating it for at least 15 minutes and verifying that each valve (manual, poweroperated, or automatic) in the flow path is in its correct position, and
- b. At least once per 18 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- b. With Rock River water level less than 670.6', verify Rock River flow is greater than 700 cfs and Rock River level is greater than 664.7'. Otherwise, be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours and implement proper plant procedures.

Byron Station proposes to modify Table 2.2-1. Table Notations (pages 2-7 and 2-8) as indicated on the attached copies.

Justification

These revisions are requested based on recent changes to the Setpoint-Study as provided by Westinghouse letter CBW-4769 (8/17/84) W. E. Kertier to J. D. Deress.

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TABLE 2.2-1 (Continued) TABLE NOTATIONS

NOTE 1: OVERTEMPERATURE AT

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 $\Delta T \left(\frac{1+\tau_1 S}{(1+\tau_2 S)} \left(\frac{1}{1+\tau_3 S}\right) \leq \Delta I_0 \left[K_1 - K_2 \left(\frac{1+\tau_4 S}{(1+\tau_5 S)} \left[T \left(\frac{1}{1+\tau_6 S}\right) - T^*\right] + K_3(P-P^*) - f_1(\Delta I)\right]$

Where: ΔT = Measured ΔT by RTD Manifold Instrumentation,

- $\frac{1 + \tau_1 S}{1 + \tau_2 S}$ = Lead-lag compensator on measured ΔI ,
 - τ_1, τ_2 = Time constants .tilized in lead-lag compensator for $\Delta I, \tau_1 = 8$ s, $\tau_2 = 3$ s,

 $\frac{1}{1 + \tau_3 S}$ = Lag compensator on measured ΔI ,

= Time constants utilized in the lag compensator for ΔI , $\tau_3 = 0$ s,

 ΔI_0 = Indicated ΔT at RATED THERMAL POWER,

= -1.48, 2 1.164

 $= 0.0265/^{\circ}F$,

- $\frac{1 + \tau_4 S}{1 + \tau_5 S}$ = The function generated by the lead-lag compensator for I avg dynamic compensation,
- $\tau_4, \tau_5 =$ Time constants utilized in the lead-lag compensator for $I_{avg}, \tau_4 = 33$ s, $\tau_5 = 4$ s,

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Average temperature, °F,

 $\frac{1}{1 + r_0 S}$ = Lag compensator on measured I avg.

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TABLE 2.2-1 (Continued)

TABLE NOTATIONS (Continued)

NOTE 1: (Continued)

= Time constant utilized in the measured I_{avg} lag compensator, $t_6 = 0$ s, LA T 588.4°F (Nominal Tave at RATED THERMAL POWER), < Ka = 0.00134. P = Pressurizer pressure, psig, P' 2235 psig (Nominal RCS operating pressure), = S = Laplace transform operator, s-1, and $f_1(\Delta I)$ is a function of the indicated difference between top and bottom detectors of the power-range neutron ion chambers; with gains to be selected based on measured instrument response during plant STARTUP tests such that: - 00 % +10% (i) for $q_t - q_b$ between -428 and -686, $f_1(\Delta I) = 0$, where q_t and q_b are percent RATED THERMAL POWER in the top and bottom halves of the core respectively, and $q_t + q_b$ is total THERMAL POWER in percent of RATED THERMAL POWER; (ii) for each percent that the magnitude of q, - q exceeds -42%, the af Trip Setpoin shall be automatically reduced by 2.86% of its value at RATED THERMAL POWER. (ith) for each percent that the magnitude of $q_t = q_b$ exceeds $\frac{+10\%}{62}$ the ΔT Trip Setpoint shall be automatically reduced by 1.86% of its value at RATED THERMAL POWER. 2.0%

NOTE 2: The channel's maximum Trip Setpoint shall not exceed its computed Trip Setpoint by more than 3. 3% of AT span.

2-8

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Byron Station proposes to modify Table 3.3-6 Table Notations (pg 3/4 3-41) as shown on the attached copy.

Justification

Currently ACTION STATEMENT 29 requires that if both channels are inoperable, a portable monitor be provided and in accordance with ACTION b of Specification 3.9.12 all operations involving movement of fuel or loads over the storage pool be suspended.

This change is based upon conversation with Fred Anderson (NRC) on 9/27/84 When a portable monitor is used, there is no means to automatically place the Fuel Handling Building Exhaust System in the emergency mode and exhaust through the HEPA and charcoal filters. Therefore, at least one Fuel Handling Building Exhaust filter plenum must be operating in the emergency mode whenever a portable monitor is used. The change proposed would require that if both channels were inoperable a portable monitor would be provided and the Fuel Handling Building Exhaust System would be placed in operation in the emergency mode. It is not necessary to suspend movement of fuel or loads over the storage pool because the radiation monitors have been replaced by a portable monitor. Only if the Fuel Handling Building Exhaust System could not be placed in operation then the requirements of ACTION b of Specification 3.9.12 would be met.

TABLE NOTATIONS

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*With new fuel or irradiated fuel in the fuel storage areas or fuel building. **Trip Setpoint is to be established such that the actual submersion dose rate would not exceed 10 mR/hr in the containment building. For containment burge or vent the Setpoint value may be increased up to twice the maximum concentration activity in the containment determined by the sample analysis performed prior to each release in accordance with Table 4.11-2 provided the value does not exceed 10% of the equivalent limits of Specification 3.11.2.1.a in accordance with the methodology and parameters in the ODCM.

ACTION STATEMENTS

- ACTION 26 With less than the Minimum Channels OPERABLE requirement, operation may continue provided the containment purge valves are maintained closed.
- ACTION 27 With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, within 1 hour isolate the Control Room Ventilation System and initiate operation of the Control Room Make-up System.
- ACTION 28 Must satisfy the ACTION requirement for Specification 3.4.6.1.

ACTION 29 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, ACTION a. of Specification 3.9.12 must be satisfied. With both channels inoperable, provide an appropriate portable continuous monitor with the same Alarm Setpoint in the fuel pool area and satisfy ACTION b. of Specification 3.9.12 with one Fuel Handling Building Exhaust filter plenum in operation. Otherwise Satisfy ACTION b. of Specification 3.9.12.

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3/4 3-41

Byron Station proposes to change the definition of DIGITAL CHANNEL OPERATIONAL TEST (page 1-2) and Table Notations (1) and (2) of Tables 4.3-8 (page 3/4 3-65) and 4.3-9 (page 3/4 3-74) and the Bases (page B3/4 3-3) as shown on the attached pages.

Justifications

Standard Technical Specifications do not define a DIGITAL CHANNEL OPERATIONAL TEST or describe what will be required in table notations for a DIGITAL CHANNEL OPERATIONAL TEST. The current versions in the table notations were originally taken from the requirements and definitions of an ANALOG CHANNEL OPERATIONAL TEST. As such, they are ambiguous and open to various interpretations when applied to a digital system. To avoid this ambiguity and possible misinterpretation, the proposed changes clearly state what is meant by a DIGITAL CHANNEL OPERATIONAL TEST and what the requirements of this test will be.

INITIONS

CONTAINMENT INTEGRITY

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- 1.7 CONTAINMENT INTEGRITY shall exist when:
 - All penetrations required to be closed during accident conditions are either:
 - Capable of being closed by an OPERABLE containment automatic isolation valve system, or
 - Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except as provided in Table 3.6-1 of Specification 3.6.3.
 - All equipment hatches are closed and sealed,
 - c. Each air lock is in compliance with the requirements of Specification 3.6.1.3.
 - d. The containment leakage rates are within the limits of Specification 3.6.1.2, and
 - e. The sealing mechanism associated with each penetration (e.g., welds, bellows, or C-rings) is OPERABLE.

CONTROLLED LEAKAGE

1.8 CONTROLLED LEAKAGE shall be that seal water flow supplied to the reactor coolant pump seals.

CORE ALTERATION

1.9 CORE ALTERATION shall be the movement or manipulation of any component within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATION shall not preclude completion of movement of a component to a safe conservative position.

DIGITAL CHANNEL OPERATIONAL TEST

date base manipulation

Loftware 1.10 A DIGITAL CHANNEL OPERATIONAL TEST shall consist of exercising the digital computer hardware using diagnostic programs and injecting simulated process data into the channel to verify OPERABILITY of alarm and/or trip functions.

DOSE EQUIVALENT I-131

1.11 DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microCurie/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test

BYRON - UNIT 1

TAELE 4.3-8 (Continued)

TABLE NOTATIONS

- The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 - Instrument indicates measured levels above the Alarm/Trip Setpoint, or

-b. Circuit failure, on	
C Instrument indicates a downscale failure, or	See INSERT
dInstrument controls not set in operate mode-]

(2) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

a. Instrument indicates measured levels above the Alarm Setpoint, or .

Circuit failure or 1. See INSERT Lostrument indicates instrument controls not set in operate #

- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.
- (4) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

TABLE 4.3-9 (Continued)

TABLE NOTATIONS

* At all times.

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- ** During WASTE GAS HOLDUP SYSTEM operation.
- The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 - Instrument indicates measured levels above the Alarm/Trip Setpoint, or

b. Circuit failure, or	1	See Insert
	7	D
d. Instrument controls not set in operate mode.)	

(2) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

a. Instrument indicates measured levels above the Alarm Setpoint, or

CIFCUIC failure, or-10.

Instrument indicates a downscale failure,

d. Instrument controls not set in operate mode-

- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that 'have been related to the initial calibration shall be used.
- (4) The CHANNEL CALIBRATION shall include the use of standard gas samples containing hydrogen and nitrogen.
- (5) The CHANNEL CALIBRATION shall include the use of standard gas samples containing oxygen and nitrogen.

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1)

b. MONITOR LOSS OF COMMUNICATIONS (ALARM ONLY), OR DETECTOR LOSS OF COMMIS, OR c. d. DETECTOR CHECK SOURCE TEST FAILURE, OR e. INSTRUMENT LOSS OF POWER, OR F. DETECTOR CHANNEL OUT OF SERVICE, OR 9. MONITOR LOSS OF SAMPLE FLOW. 2) 6. MONITOR LOSS OF COMMUNICATIONS, OR C. DETECTOR LOSS OF COUNTS, OR

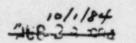
d. DETECTOR CHECK SOURCE TEST FAILURE, OR

e. INSTRUMENT LOSS OF POWER, OR

F. DETECTOR CHANNEL OUT OF SERVICE

9. MONITOR LOSS OF SAMPLE FLOW.

INSTRUMENTATION



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Engineered Safety Features Actuation System Interlocks

The Engineered Safety Features Actuation System interlocks perform the following functions:

P-4 Reactor tripped - Actuates Turbine trip, closes main feedwater valves on T below Setpoint, prevents the opening of the main feedwater valves which were closed by a Safety Injection or High Steam Generator Water Level signal, allows Safety Injection block so that components can be reset or tripped.

Reactor not tripped - prevents manual block of Safety Injection.

- P-11 On increasing pressure P-11 automatically reinstates Safety Injection actuation on low pressurizer pressure and low steamline pressure and automatically blocks steamline isolation on negative steamline pressure rate. On decreasing pressure; P-11 allows the manual block of Safety Injection low pressurizer pressure and low steamline pressure and allows steamline isolation on negative steamline pressure rate to become active upon manual block of low steamline pressure SI.
- P-12 On increasing reactor coolant loop temperature, P-12 automatically provides an arming signal to the Steam Dump System. On decreasing reactor coolant loop temperature, P-12 automatically removes the arming signal from the Steam Dump System.
- P-14 An increasing steam generator water level, P-14 automatically trips all feedwater isolation valves and inhibits feedwater control valve modulation.

3/4.3.3 MONITORING INSTRUMENTATION

3/4.3.3.1 RADIATION MONITORING FOR PLANT OPERATIONS ,TRIP FUNCTION

The OPERABILITY of the radiation monitoring instrumentation for plant operations ensures that: (1) the associated ACTION will be initiated when the radiation level monitored by each channel or combination thereof reaches its setpoint, (2) the specified coincidence logic is maintained, and (2) sufficient redundancy is maintained to permit a channel to be out-of-service for testing or maintenance. The radiation monitors for plant operations senses radiation levels in selected plant systems and locations and determines whether or not predetermined limits are being exceeded. If they are, the signals are combined into logic matrices consistive to combinations indicative of various accidents and abnormal conditions. Once the required logic combination is completed, the system sends actuation signals to initiate alarms of automatic isolation action and actuation of Emergency Exhaust or Ventilation Systems. The radiation monitor Setpoints given in the requirements are assumed to be values established above normal background radiation levels for the particular area.

Byron Station proposes to modify Table 3.3-11 Fire Detection Instruments (page 3/4 3-59), Table 3.7-5 Fire Hose Stations (pages 3/4 7-37 and 3/4 7-38) and Table 3.8-1 Containment Penetration Conductor Overcurrent Protective Devices (pages 3/4 8-19 to 3/4 8-27) as indicated on the attached copies.

Justification

1. .

These changes are requested based on recent review by Byron Station as part of the Technical Specification certification process.

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TABLE 3.3-11 (Continued)

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I	NSTRUMENT LOCATION	INSTRUMENT TYPE*			
		INSTROMENT TOPE	-0-4L N	UMBER OF INS	STRUMENTS
6	. Station Battery Room		Heat	Flame	Smoke
	Zone 67 Elev 451	Detection			13
7	. Diesel Generator Room			•	
	Zone 37 Elev 401	Suppression	* 6		
	Zone 38 Elev 401	Suppression	46		
	Zone 71 Elev 401	Detection	- 0	,	
	Zone 72 Elev 401	Detection		1	
8.	Diesel Fuel Storage				
	Zone 39 Elev 401	Suppression			
	Zone 40 Elev 401	Suppression	1 1 3		
	Zone 27 Elev 383	Suppression	-		
	Zone 28 Elev 383	Suppression	3		
	Zone 10 Elev 383	Detection			6
9.	Safety Related Pumps				
	Zone 41 Elev 383	Suppression	,		
	Zone 42 Elev 383	Suppression	2		
	Zone 16 Elev 364	Detection			-
	Zone 18 Elev 364	Detection			2 10 2 3 3 3
	Zone 19 Elev 364	Detection			2 2
	Zone 20 Elev 346	Detection			
	Zone 21 Elev 346	Detection			3
	Zone 52 RSH	Suppression	8		
10	. Fuel Storage	이 많은 것이 있는 것이 없다.			
	Zone 39 Elev 401	Detection			20
	Zone 38 Elev 426	Detection		3	29
				2	

TABLE NOTATIONS

- *A single detector in a zone marked "Detection" will alarm in the Main Control Room. A single detector in a zone marked "Suppression" will initiate suppression and alarm in the Main Control Room.
- **These are Containment Ventilation temperature switches. Upon receipt of a Hi-Hi temperature, suppression must be manually initiated. These switches are not 72D supervised.
- *** The fire detection instruments located within the containment are not required to be OPERABLE during the performance of Type A containment leakage rate tests.

TABLE 3.7-5 (Continued)

FIRE HOSE STATIONS

LOCAT	ION		ELEVATION	HOSE RACK REEL	ANGLE VALVE	
Aux. I	Bìdg.	(Continued)				
	H-18:	By Aux. Feedwater motor driven pump 1A	387	108	OFP383	
1	N-23:	By remote shutdown panel U-1	387	111	0FP376	
	Q-15:	By 480V MCC 132X3	387	113	OF P382	
	V-18:	a second s	387	114	0FP379	
	P-7:	West Wall 6.9 kV switchgear room	455	20	0FP324	
	L-11:	In UC HVAC Rm OA of LCSR C-1	455	22	OFP332 INSERT A	
	M-8:	South wall of battery room	451	279	OF P638	
,	H-26:	South wall of battery room	451	280	OFP639	
	H-18:	North wall U-1 AB by door	444	238*	OFP463	
	1-7:	East wall LCSR A-1	443	207*	OFP330	
	4-10:	In the southeast corner or LCSR B-1	443	208*	OFP327	
	P-10:	In the southwest corner of LCSR 8-1	443	209*	OFP325	
	4-13:	South wall of LCSR C-1	443	210*	OF P326	
15 1	2-15:	West wall of LCSR D-1	443	211*	CFP328	
	-21:		431	229	0FP45% 4	
2	-24:	By U-2 cont. shield wall (elec pen. area)	431	230	OFP458 5 ENSERT B	
2	-12:	By U-1 cont. shield wall (elec pen. area)	431	237	OFP462	
	-11:	Outside Laundry Room	430	52	OFP313 INSECT C	
	-19:		430	54	OFP342	
P	-24:	By radwaste evaporator	430	55	OFP343	
	-17:	, and the second click dica	430	58	0FP319	
V	-17:	By west door to decon/change area	430	61	OFP320 AND	
	-11:		405	90	OFP315	
P	-18:	By elevator	405	91	019318	
P	-23:	By spent resin pumps	405	92	OFP349	
9	-11:	By laundry tanks	405	93	OFP314	-
S	-21:	East of U-2 hydrogen recombiner	405	94	OFP348	đ
V	-21:	West of U-2 hydrogen recombiner	405	95	OF P345	9
V	-15:	West of U-1 hydrogen recombiner control				9
		pane l	405	96	OFP316	9

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TABLE 3.7-5 (Continued)

FIRE HOSE STATIONS

LOCATION		ELEVATION	HOSE RACK REEL	ANGLE VALVE
Aux. Bldg.	(Continued)			
S-15:	East of U-1 hydrogen recombiner	405	97	057317
N-11:	By the recycle holdup tanks	368	130	OFP373
1-13 #-14:	By the U-1 stairs	368	131	OFP374
-13 -14:	By panel 1PL84JB	368	132	OFP369
L-20:	By the U-2 stairs	368	133	OF P 355
P-21:	By the blowdown condenser	368	134	OFP356
L-25:		368	135	OFP361
N-25:	By chemical drain tank	368	136	OFP357
S-18:	By panel 1PL86J	368	138	OF P362
Q-11:		368	139	0FP368
U-15:	By U-1 spray add tank	368	140	OFP372 INSERTE
P-11:		350	151	OFP381
M-13:		350	152	OF P370
N-23:		350	154	0FP352
Q-19:		350	155	OF P 365
Q-17:	By "A" Aux. Bldg. Equip. drain tank	350	156	OFP371
	By collection sump pumps	350	157	0FP380
S-18:		350	158	OFP354
V-18:	Retween BR chiller units	350	161	OFP353
W-15:	By CS pump 1A	350	163	OFP367
H-13:	By leak detection sump	334	165	OFP448
P-18:	By elevator pit	334	166	OFP448 OFP449 TNSERT F
uel Hand.	Bldg.			OFP449TNSER
	South of decon. area	430	170	OF P389 5
X-21:	North of spent fuel pool	430	171	OF P386
	By 480V MCC 134X6	405	172	OF P 368
AA-19:	Outside FC pump room	405	1/3	OF P38/
ont. #1				
R-17:		430	62	1FP163 1FP154
R-2:	By accumulator tank IC	430	63	169154

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Inserts to pages :		HOSE	
AUX. Bidg.	ELEVATION	REEL	ANGLE VALVE
INSERT A			
L-25: By OE "HVAC room	455	27	OFP335
INSERT 8			
S-15: By Pzr htr. transformer (elec. pen. area)	431	236	OFP461
INSERT C Q-10: Back of Div. 11 swgr room	430	283	OFP640
INSERT D S-15: By Pzr. htr. transformer (elec pen. area)	419	174	OFP 322
Q-10: By electrical penetration area	419	205	0FP321
<u>INSERT E</u> V-18: By U-2 cent. chg. pump room	368	141	OFP366
INSERT F P-18: By 18 SX pump room	334	167	OFP35)
M-23: By 1B Sx pump room	334	168	OFP 350

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TABLE 3.8-1

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CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

PROTECTIVE DE		DEVICE
1. 6.9 kV Sw	itchgear	
1RCO1PA-RO Bus 157 (Primary
Bus 157 No ACB 1571	orm. Feed	Backup
Bus 157 En ACB 1572	nerg. Feed	Backup
1RCO1PB-RC Bus 156 C		Primary
Bus 156 No ACB 1561		Backup
Bus 156 Em ACB 1562		Backup
1RC01PC-RC Bus 158		Primary
Bus 158 No ACB 1582	rm. Feed	Backup
Bus 158 Em ACS 1581	erg. Feed	Sackup
1RC01PD - Bus 159 C		Primary
Bus 159 No ACB 1592		Backup
Bus 159 Em ACB 1597	erg. Feed	Backup
2. 480V Switc	hgear	
1RYO3EA - Htr. Backu	p Group A	Primary
Compt. Al-	A6, B1	Backup
1RYO3EB - Htr. Backu	p Group B	Primary
Compt. 81-	36, Al	Backup

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TABLE 3.8-1 (Continued)

CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

PROTECTIVE DEVICE NUMBER AND LOCATION	
2. 480V Switchgear (Continue	DEVICE
1RYOJEC - Pzr. Htr. Backup Group C	Primary
Compt. Al-A6	Backup
1RYO3ED - Pzr. Htr. Backup Group D Compt. B1-B6	Primary
3. 480V A.C. Ckt. Ekrs.	Backup
1VPOICA - RCFC Fan 1A Low Speed Feed 8kr Swgr 131X	
Cub 4C	Primary
Hi Speed Feed Bkr Swgr 131X Cub 5C	Primary
1VP01CC - RCFC Fan 1C Low Speed	
Feed Bkr Swgr 131X Cub AC 2C	Primary
Hi Speed Feed Bkr Swgr 131X Cub 50 3C	Primary
Bus 131X Norm.	
Feed 141 Swgr., Cub 14, 19 ACB 1415X	Backup
1VP01CB - RCFC Fan 1B	
Low Speed Feed Bkr Swgr 132X Cub 4C	Primary
Hi Speed Feed Bkr Swgr 132X Cub 5C	Primary
1VP01CD - RCFC Fan 1D	
Low Speed Feed Bkr Swgr 132X Cub 2C	Primary

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TABLE 3.8-1 (Continued)

CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

PROTECTIVE DEVICE NUMBER AND LOCATION DEVICE 48QV A.C. Ckt. Bkrs. (Continued) 3. Hi Speed Feed Bkr Primary Swgr 132X Cub 3C Bus 132X Norm. Feed 142 Swgr., Cub 14, ACB 14234 1425% Backup 4. 480V Molded Case Ckt. Bkts. (MCCB) MCC 133X4 IRCO1PA-A Primary Cub B1 Backup IRCOIPA-B Primary Cub 82 Backup 1HC22G Primary Cub B3 Backup 1FH03GG Primary Cub 84 Backup IVPOSCA Primary Cub C1 Backup 1RF03P Primary Cub C2 Backup IRCOIPD-A Primary Cub D1 Backup 18C01PD-8 Primary Cub D2 Backup 1RF02PB Primary Cub D4 Backup

> Primary Backup

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1RF01P

Cub D5

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TABLE 3.8-1 (Continued)

CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

NUMBER AND LOCATION	DEVICE
4. 480V Molded Case Ckt. Bkts.	(MCCB) (Continued)
	MCC 13334
IREOIPA Cud D6	Primary Backup
IVPO2CA Cud El	Primary Backup
1VP04CA	
Cub E2	Primary Backup
IVP04CC Cub F1	Primary Backup
1EW11EA, B, C Cub F3	Primary
	Backup
1641165	Primary Q Backup Q
HEWITE	PrimaryQ
Gub t.	Backup e
11002EA Cub F5	Primary Backup
1ICO2EB	
Cub G1	Primary Backup
1ICO2EC	Primary
Cub G2	Backup MCC 134X5
LICO2EF Cub Al	Primary Backup
1ICO2EE	Primary
Cub A2	Backup
LICO2ED Cub A3	Primary Backup

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TABLE 3.8-1 (Continued)

CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

PROTECTIVE DEVICE NUMBER AND LOCATION

DEVICE

4. 480V Molded Case Ckt. Bkts. (MCCB) (Continued)

1	133X5 MCC 133×5
TFHO2J	Primary
Cub G1	Backup
SFHOJJ	Primary
Cub G2	Backup
1RC01P8-B	Primary
Cub 81	Backup
1RE01PB	Primary
Cub B3	Backup
	HCC 134+5 Q
IRCOIPC-A	Primary
Cub Cl	Backup
1RC01PC-B	
Cub C2	Primary Backup
1VP05C8	
Cub J1	Primary Backup
1000100-4	
1RC01PB-A Cub C3	Primary
G	Backup
1HC65#-A Cub D3	Primary
Cub US	Backup
1VP02CB	Primary
Cub F1	Backup
IRCOIR-A	Primary
Cub F2 A B	Backup
1RF02PA	Primary
Cub G3	Backup
1EW12EA, B, C	
Cub F3 A & B	Primary Backup
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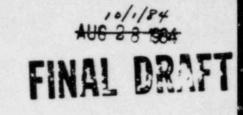


TABLE 3.8-1 (Continued)

CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

PROTECTIVE DEVICE NUMBER AND LOCATION

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DEVICE

4. 480V Moided Case Ckt. Bkts. (MCCB) (Continued)

	MCC 134X5
1EW12E8	Derive a
- Cub 53	Backup P
	Backup_e_
-1EW12EC	Primary P
-Cub F3	Backup Q
1VP04CB	Primary
Cub F4	Backup
1VP04CD	
Cub F5	Primary
	Backup
15I8808C	- MCC 132X24
MCC 132X2 Cub A2	Primary
CUB B2	Backup
15188088	2 diama
Cub A3	Primary Backup
	Backup
1RH8702B	Primary
Cub B1	Backup
10107010	
1RH8701B	Primary
Cub B3	Backup
	\sim
김 사장 없는 것을 가지 않았는 것이 가지 않는 것을 많은	$\left(\frac{MCC \ 132X2}{2}\right)$
1CV8112	Primary
Cub 84	Backup
10G079	
Cub C1	Primary
	Backup
1W0056A	
Cub C2	Primary
	Backup
106080	Primary
Cub C3	Backup
	Packap

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TABLE 3.8-1 (Continued)

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CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
4. 480V Molded Case	e Ckt. Bkts. (MCCB) (Continued)
	MCC 132X2
1RY8000B Cub C4	Primary Backup
1878003C Cub 65 D5	Primary Backup
LIPOSE Cub El O	animary
1RC8003B Cub D4	Primary Backup
111433 Cub 52	Backwo P.
1RC8002A Cub G1	Primary Backup
1RC8002B Cub G2	Primary Backup
1RC8002C Cub G3	Primary Backup
1RC8002D Cub G4	Primary Backup
15I8808D	MCC 131×2A
Cub A2	Primary . Bockup
ISI8808A Cub A3	Primary
(MCC 131 x 2) 2	Backup
	MCC 131x2
1RC8001A Cub G1	Primary Backup
BYRON - UNIT 1	3/4 8-25

TABLE 3.8-1 (Continued)

CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

PROTECT	IVE	DEVICE
NUMBER	AND	LOCATION

DEVICE

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4. 480V Molded Case Ckt. Bkts. (MCCB) (Continued)

	131×2 MCC 132+2A C
1RC8001B	Primary
Cub G2	Backup
1RC8001C	Primary
Cub G3	Backup
1RC8001D	Primary
Cub G4	Backup
1RH8701A	Primary
Cub 81	Backup
1RH8702A	Deiesen
Cub B4	Primary Backup
111423	영화 가지 않는 것 같은 것 같은 것 같이 많이
Cub Cl	Primary Backup
1V0001A	
Cub C3	Primary Backup
1V0002A	
Cub F1	Primary Backup
1RC8003D	
Cub C4	Primary
1000000	Backup
1RC8003A Cub C5	Primary
	Backup
10G057A Cub D1	Primary
	Backup
1009416	Primary
Cub D3	Backup
1009438	Primary
Cub D4	Backup
100081	Primary
Cub E2	Backup

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TABLE 3.8-1 (Continued)

CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

PROTECTIVE DEVICE NUMBER AND LOCATION

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DEVICE

4. 480V Molded Case Ckt. Bkts. (MCCB) (Continued)

G	MCC 133X6
1HC018 - Cub 82 Cub 81	Primary
2	Backup
1LLO4E - Cub CY Cub C1	Primary
	Backup
IVPO3CA Cub A3	Primary
COD HS	Backup
1VP03CD	Primary
Cub C4	Backup
	MCC 132x5 0
1009414 	Primary Q
	Backup
	MCC 134X7
ILLOSE - CUB B2	Primary
Cub 81_82	Backup
1VP03CB	Primary
Cub A3	Backup
LVPO3CC	Primary
Cub 84	Backup
	MCC 131X28
CUD AZ	Primary
	Backup
LRY8000A Cub A5	Primary
	Backup

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Byron Station proposes to change Surveillance Requirement 4.8.1.1.2.f 7) (page 3/4 8-5) as indicated on the attached copy.

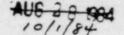
Justification

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The maximum loading on the diesel generator has been limited to 6050 kW per vendor recommendations. The 6050 kW (+0,-150 kW) establishes a bandwidth in order to compensate for grid fluctuations.

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ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 5) Verifying that on an ESF Actuation test signal without loss of ESF bus voltages, the diesel generator starts on the autostart signal and operates on standby for greater than or equal to 5 minutes. The generator voltage and frequency shall be 4160 + 420 volts and 60 + 1.2 Hz within 10 seconds after the auto-start signal; the generator steady state generator voltage and frequency shall be maintained within these limits during this test;
- Simulating a loss of ESF bus voltage in conjunction with an ESF Actuation test signal, and
 - Verifying deenergization of the ESF busses and load shedding from the ESF busses;
 - b) Verifying the diesel starts on the auto-start signal, energizes the ESF busses with permanently connected loads within 10 seconds, energizes the auto-connected emergency (accident) loads through the LOCA sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with emergency loads. After energization, the steady-state voltage and frequency of the ESF busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz during this test; and
 - c) Verifying that all automatic diesel generator trips, except engine overspeed and generator differential, are automatically bypassed upon loss-of-voltage on the emergency bus concurrent with a Safety Injection Actuation signal.
- 7) Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to greater than or equal to 6050 kW and during the remaining 22 hours of this test, the diesel generator shall be loaded to greater than or equal to 5500 kW. The generator voltage and frequency shall be 4160 + 420 volts and 60 + 1.2 Hz within 10 seconds after the start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, perform Specification 4.8.1.1.2f.6)b);*
- Verifying that the auto-connected loads to each diesel generator do not exceed the 2000-hour rating of 5935 kW;

BYRON - UNIT 1

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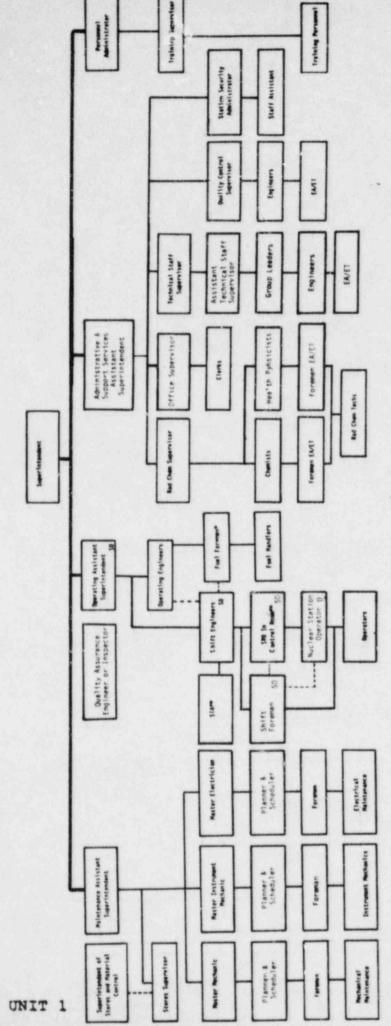
^{*}If Specification 4.8.1.1.2f.6)b) is not satisfactorily completed, it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at 5500 kW for 1 hour or until operating temperature has stabilized.

Byron Station proposes to modify Technical Specification Figure 6.2-2, UNIT ORGANIZATION (pg 6-4), as attached.

Justification

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This revision to Figure 6.2-2 is to resolve a Byron Station senior resident NRC inspector open item 454/84-42-01; 455/84-29-01. This figure is representative of the unit organization.



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Figure 6.2-2 UNIT ORGANIZATION 1

 Reactor Oberator's License
 Sector Oberator Operator's License
 Sector Operator Operator's License
 The fuel Handling Foreman shall have a limited or a full Senior Operator's License
 May be filled by a SCRE

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6-4

Byron Station proposes to modify Table 3.12-1(pg 3/4 12-4), T.S. 3/4.12.3 (pg 3/4 12-14), T.S. 6.5.2 bl) (pg 6-12), T.S. 6.9.1.6 (pg 6-19), T.S. 6.9.1.7 (pg 6-21) and T.S. 6.14.2a (pg 6-25) as shown on the attached pages.

Justification

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These changes are requested based on recent review by Byron Station as part of the Technical Specification certification process.

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TABLE 3.12-1 (Continued)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

EXPOSURE PATHWAY AND/OR SAMPLE

2. Airborne

Radioiodine and Particulates

BYRON - UNIT

3. Waterborne

a. Surface⁽⁵⁾

b. Ground

c. Drinking

NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS⁽¹⁾

Samples from five locations:

Three samples from close to the three SITE BOUNDARY locations, in different sectors, of the highest calculated annual average ground level D/Q;

One sample from the vicinity of a community having the highest calculated annual average groundlevel D/Q; and

One sample from a control location, as for example 10 to 30 km distant and in the least prevalent wind direction.

One sample upstream. One sample downstream.

Samples from one or two sources) only if likely to be affected (7).

One sample of each community drinking water supply downstream of the plant within 10 kilometers.

One sample from a control location.

SAMPLING AND COLLECTION FREQUENCY

Continuous sampler operation with sample collection weekly, or more frequently if required by dust loading. TYPE AND FREQUENCY OF ANALYSIS

Radioiodine Cannister:

I-131 analysis weekly, MAY THROUGH OCTOBER, bi-weekly November Through APRIL .

Particulate Sampler: Gross beta radioactivity analysis following filter change; and gamma isotopic analysis of composite (by location) guarterly.

Composite sample over 1-month period. by WEEKLY GRAB SAMPLES.

Quarterly.

Composite sample over 2-week period(6) when I-131 analysis is performed, monthly composite otherwise. Gamma isotopic analysis⁽⁴⁾ monthly. Composite for tritium analysis quarterly. Gamma isotopic⁽⁴⁾ and tritium analysis quarterly.

I-131 analysis on each composite when the dose calculated for the consumption of the water is greater than 1 mrem per year. (8) Composite for gross beta and gamma isotopic analyses monthly. Composite for tritium analysis quarterly.

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RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.3 INTERLABORATORY COMPARISON PROGRAM

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LIMITING CONDITION FOR OPERATION

3.12.3 Analyses shall be performed on radioactive materials, suppled as part of an Interlaboratory Comparison Program that has been approved by the Commission, that correspond to samples required by Table 3.12-1.

APPLICABILITY: At all times.

ACTION:

- a. With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.6.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.3 The Interlaboratory Comparison Program shall be described in the ODCM. A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.6. ADMINISTRATIVE CONTROLS

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6.13 PROCESS CONTROL PROGRAM (PCP)

- 6.13.1 The PCP shall be approved by the Commission prior to implementation.
- 6.13.2 Licensee-initiated changes to the PCP:
 - a. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:

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- Sufficiently detailed information to totally support the rationale for the change wchout benefit of additional or supplemental information;
- A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
- Documentation of the fact that the change has been reviewed and found acceptable by the Onsite Review and Investigative Function.
- b. Shall become effective upon review and acceptance by the Onsite Review and Investigative Function in accordance with Specification 6.5.2.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

- 6.14.1 The ODCM shall be approved by the Commission prior to implementation.
- 6.14.2 Licensee-initiated changes to the ODCM:
 - a. Shall be submitted to the Commission, in the Semiannual Radioactive <u>Effluent Release Report for the period in which change(s)</u> was made <u>effective</u>. This submittal shall contain:
 - Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered, dated and containing the revision number, together with appropriate analyses or evaluations justifying the change(s);
 - A determination that the change will not reduce the accuracy or reliability of dose calculations or Setpoint determinations; and
 - Documentation of the fact that the change has been reviewed and found acceptable by the Onsite Review and Investigative Function.
 - b. Shall become effective upon review and acceptance by the Onsite Review and Investigative Function in accordance with Specification 6.5.2.

BYRON - UNIT 1

ADMINISTRATIVE CONTROLS

OFFSITE (Continued)

h) Instrumentation and Control

Engineering graduate or equivalent with at least 5 years of experience in instrumentation and control design and/or operation.

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i) Metallurgy

Engineering graduate or equivalent with at least 5 years of experience in the metallurgical field.

3) The Supervisor of the Offsite Review and Investigative Function shall have experience and training which satisfy ANSI N18.1-1971 requirements for plant managers.

ONSITE

6.5.2 The Onsite Review and Investigative Function shall be supervised by the Station Superintendent.

a. Onsite Review and Investigative Function

The Station Superintendent shall: (1) provide directions for the Review and Investigative Function and appoint the Technical Staff Supervisor, or other comparably qualified individual as the senior participant to provide appropriate directions; (2) approve participants for this function; (3) assure that at least two participants who collectively possess background and qualifications in the subject matter under review are selected to provide comprehensive interdisciplinary review coverage under this function; (4) independently review and approve the findings and recommendations developed by personnel performing the Review and Investigative Function; (5) report all findings of noncompliance with NRC requirements, and provide recommendations to the Division Vice President and General Manager - Nuclear Stations and the Supervisor of the Offsite Review and Investigative Function; and (6) submit to the Offsite Review and Investigative Function for concurrence in a timely manner, those items described in Specification 6.5.1a which have been approved by the Onsite Review and Investigative Function.

b. Responsibility

The responsibilities of the personnel performing this function are: STATION SPECIFIC PORTIONS OF

 Review of: (1) procedures required by Specification 6.8.1 and changes thereto, (2) all programs required by Specification 6.8.4 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Plant Superintendent to affect nuclear safety;

 Review of all proposed tests and experiments that affect nuclear safety;

BYRON - UNIT 1

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ADMINISTRATIVE CONTROLS

REPORTING REQUIREMENTS (Continued)

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.6 Routine Annual Radiological Environmental Operating Reports covering the operation of the Unit during the previo's calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activites for the report period, including a comparison with preoperational studies, with operational controls as appropriate, and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. <u>The reports shall also include the results of the Land Uce Concus required by</u> <u>Specification 2.12.2</u> Staked also include a Disting of new locations for done collevelations and/or environmental monitoring identified by the land use cancus persuant to Specification 3.12.2

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the tables and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the Radiological Environmental Monitoring Program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program and the corrective actions being taken if the specified program is not being performed as required by Specification 3.12.3; reasons for not conducting the Radiological Environmental Monitoring Program as required by Specification 3.12.1, and discussion of all deviations from the sampling schedule of Table 3.12-1; discussion of environmental sample measurements that exceed the reporting levels of Table 3.12-2 but are not the result of plant effluents, pursuant to Specification 3.12.1; and discussion of all analyses in which the LLD required by Table 4.12-1 was not achievable.

*A single submittal may be made for a multiple unit station.

**One map shall cover stations near the SITE BOUNDARY; a second shall include the more distant stations.

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ADMINISTRATIVE CONTROLS

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REPORTING REQUIREMENTS (Continued)

"Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof. For solid wastes, the format for Table 3 in Appendix B shall be supplemented with three additional categories: class of solid wastes (as defined by 10 CFR Part 61), type of container (e.g., LSA, Type A, Type B, Large Quantity), and SOLIDIFICA-TION agent or absorbent (e.g., cement, urea formaldehyde).

The Semiannual Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Semiannual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PCP and to the ODCM, pursuant to Specifications 6.13 and 6.14 respectively, as well as any major changes to Liquid, Gaseous or Solid Radwaste Treatment Systems, pursuant to Specification 6.15. It shall also include a listing of new locations for dose calculate tions and/or environmental monitoring identified by the land use census pursuante to Specification 3.12.2.

The Semiannual Radioactive Effluent Release Reports shall also include the following: an explanation as to why the inoperability of liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified in Specifications 3.3.3.10 or 3.3.3.11, respectively; and description of the events leading to liquid holdup tanks or gas storage tanks exceeding the limits of Specification 3.11.1.4 or 3.11.2.6, respectively.

MONTHLY OPERATING REPORT

6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or RCS safety valves, shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the NRC Regional Office, no later than the 15th of each month following the calendar month covered by the report.

RADIAL PEAKING FACTOR LIMIT REPORT

6.9.1.9 Changes to the F_{xy} limits for Rated Thermal Power (F_{xy}^{RTP}) shall be provided to the NRC Regional Administrator with a copy to Director of Nuclear Reactor Regulation, Attention: Chief, Core Performance Branch, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555 for all core planes containing Bank "D" control rods and all unrodded core planes and the plot of predicted (F_q^T, P_{Rel}) vs Axial Core Height with the limit envelope at least 60 days prior to cycle initial criticality unless otherwise approved by the Commission by

letter. In addition, in the event that the limit should change requiring a new

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