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October 24, 1984

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Byron Generating Station Units 1 and 2  
Reactor Systems Technical Specifications  
NRC Docket Nos. 50-454 and 50-455

References (a): October 11, 1984, letter from T. R. Tramm  
to H. R. Denton.

(b): October 18, 1984 letter from T. M. Novak  
to D. L. Farrar.

Dear Mr. Denton:

This letter provides additional information concerning operation of Byron Unit 1 pending final resolution of the questions from the Reactor Systems Branch. This information is submitted to permit finalization of the operating license.

In reference (a), Commonwealth Edison committed to resolution of the issue identified in RSB question number 11 regarding Technical Specification number 3.4.1.3 and the supporting safety analysis of rod withdrawal transients. We indicated that we would provide a plant specific resolution in the event that the efforts of the Westinghouse Owners Group (WOG) do not satisfactorily resolve the NRC concerns.

Pending final resolution of that matter, we believe that Byron Unit 1 can be operated safely and in compliance with GDC number 10 because the rod withdrawal transient of interest will not occur. This assurance is provided by the following factors:

- 1) The control rod drive mechanisms are not normally energized when reactor coolant pumps are not operating. Certain tests of the control rods are conducted without operation of the reactor coolant pumps but these tests are of limited duration and are closely controlled by approved procedures. In all other circumstances, plant administrative controls will assure that the control rod drives are not energized.

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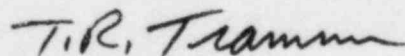
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- 2) Uncontrolled rod withdrawal during the test periods is highly unlikely. The rod control system permits automatic rod movement only in MODE 1. Manual operation of the control rods during test requires direct operator involvement in the manipulation of the controls. Adequate indications are available in the control room for the operator to promptly detect an uncontrolled rod withdrawal event and trip the reactor.
- 3) During the periods when the control rod drives are energized for testing without two reactor coolant pumps operating, the reactor coolant will be borated to 2000 ppm or greater. Our calculations indicate that reactor criticality cannot occur with all of the control rods withdrawn when the boron concentration is at that level.

This concern, along with the other generic concerns discussed in reference (a) will be addressed on a schedule acceptable to the NRC and we will not deviate from that schedule without prior NRC agreement. Our present estimate is that the WOG effort will resolve all of these issues prior to startup following the first refueling.

Attachment A to this letter contains the appropriately revised wording for the license condition which was provided to us in reference (b).

Very truly yours,



T. R. Tramm  
Nuclear Licensing Administrator

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ATTACHMENT A

Revised License Condition

Reactor Systems Technical Specifications

The licensee shall provide the responses committed in their October 11, 1984 letter on a schedule acceptable to the NRC as indicated in the Commonwealth Edison letter dated October 23, 1984. The schedule for providing these responses shall not be altered without prior NRC agreement.