



November 8, 1995

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: Supplemental Information Regarding the Application for Amendment to
Appendix A, Technical Specification 5.3.1, Fuel Assemblies, for

Byron Nuclear Power Station, Units 1 and 2
Facility Operating Licenses NPF-37 and NPF-66
NRC Docket Nos. 50-454 and 50-455

Braidwood Nuclear Power Station, Units 1 and 2
Facility Operating Licenses NPF-72 and NPF-77
NRC Docket Nos. 50-456 and 50-457

References: See Attachment

Ladies and Gentlemen:

In Reference 4, Commonwealth Edison Company (ComEd) proposed to amend Appendix A, Technical Specifications, for Facility Operating Licenses NPF-37, NPF-66, NPF-72, and NPF-77 for Byron Nuclear Power Station, Units 1 and 2 (Byron), and Braidwood Nuclear Power Station, Units 1 and 2 (Braidwood), respectively. ComEd proposed to revise Technical Specification 5.3.1, Fuel Assemblies, to allow use of an alternate zirconium based fuel cladding, ZIRLO. Limited substitution of fuel rods by ZIRLO filler rods would also be permitted. Two editorial changes were also proposed. ComEd requested that the United States Nuclear Regulatory Commission (USNRC) Staff review and approve this license amendment request no later than January 5, 1996, in order to support the receipt of new fuel with ZIRLO cladding for Spring 1996 Refuel Outages at both Byron and Braidwood.

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Due to the expedited nature of this request, ComEd decided to limit the scope of the proposed changes to only those actually needed, rather than rewriting Technical Specification 5.3.1, Fuel Assemblies, in accordance with the guidance provided in Generic Letter 90-02, Supplement 1 (GL 90-02S1) (Reference 1). Also factored into this decision was that the guidance provided in GL 90-02S1 has been incorporated into the Improved Standard Technical Specifications (ISTS) (Reference 2) and ComEd had previously notified the USNRC Staff of its intent to convert to ISTS at Byron and Braidwood (Reference 3) with a submittal targeted for June 1996.

During the USNRC Staff review of ComEd's license amendment request (Reference 4) one particular concern was raised relating to the guidance provided in GL 90-02S1. In GL 90-02S1, the USNRC Staff proposed, in part, the following words be included in a line-item change for "Fuel Assemblies" in Section 5, "Design Features" of the technical specifications. "Fuel assemblies shall be limited to those fuel designs that have been analyzed with applicable NRC staff-approved codes and methods, and shown by tests or analyses to comply with all fuel safety design bases." Although this requirement is implied by the current Byron and Braidwood Technical Specifications, it is not explicitly stated. This issue was not addressed in the license amendment request because, as previously stated, the proposed changes were limited to those actually required to support the receipt of new fuel with ZIRLO cladding for Spring 1996 Refuel Outages at both Byron and Braidwood. ComEd provides the following additional information to address the USNRC Staff concern.

ComEd has contracted with the Westinghouse Electric Corporation (Westinghouse) through the year 2000 to provide fuel for Byron and Braidwood. Westinghouse changes fuel designs in accordance with a USNRC staff-approved topical report, WCAP-12488-A, "Westinghouse Fuel Criteria Evaluation Process," October 1994 (Proprietary). If certain criteria are satisfied, Westinghouse can make changes to existing fuel designs without prior USNRC staff review and approval; however, Westinghouse did agree to submit any such changes to the USNRC staff for information.

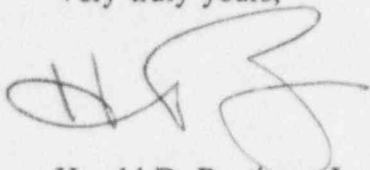
Byron and Braidwood will implement the guidance provided in GL 90-02S1 through their planned conversion to the ISTS, currently scheduled for implementation prior to the expiration of the fuel contract. If there is a change to the fuel contract prior to ISTS implementation, ComEd will notify the USNRC staff.

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.

November 8, 1995

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

Very truly yours,



Harold D. Pontious, Jr.
Nuclear Licensing Administrator

Attachment

- cc: H. J. Miller, Regional Administrator - RIII
- G. F. Dick Jr., Byron Project Manager - NRR
- R. R. Assa, Braidwood Project Manager - NRR
- H. Peterson, Senior Resident Inspector - Byron
- S. P. Ray, Acting Senior Resident Inspector - Braidwood
- Office of Nuclear Facility Safety - IDNS

Signed before me

on this 8th day of November, 1995



by Mary Jo Yack
Notary Public

ATTACHMENT

References

1. Generic Letter 90-02, "Alternate Requirements for Fuel Assemblies in the Design Features Section of Technical Specifications," Supplement 1, dated July 31, 1992
2. NUREG-1431, "Standard Technical Specifications for Westinghouse Plants," Revision 1, April 1995
3. Karl L. Kaup / Kenneth L. Graesser (ComEd) letter to USNRC Document Control Desk, Notification of Intent to Adopt the Improved Standard Technical Specifications at Braidwood and Byron Nuclear Power Stations, dated May 31, 1995
4. Harold D. Pontious, Jr. (ComEd) letter to USNRC Document Control Desk, Application for Amendment to Appendix A, Technical Specifications, for Operating Licenses NPF-37, NPF-66, NPF-72, and NPF-77 regarding Fuel Assemblies, dated September 14, 1995