



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 46 TO FACILITY OPERATING LICENSE NO. NPF-37,
AMENDMENT NO. 46 TO FACILITY OPERATING LICENSE NO. NPF-66,
AMENDMENT NO. 35 TO FACILITY OPERATING LICENSE NO. NPF-72,
AND AMENDMENT NO. 35 TO FACILITY OPERATING LICENSE NO. NPF-77
COMMONWEALTH EDISON COMPANY
BYRON STATION, UNIT NOS. 1 AND 2
BRAIDWOOD STATION, UNIT NOS. 1 AND 2
DOCKET NOS. STN 50-454, STN 50-455, STN 50-456 AND STN 50-457

1.0 INTRODUCTION

By letter dated June 10, 1991, as supplemented on October 17, 1991, Commonwealth Edison Company, (CECo, the licensee) proposed to incorporate programmatic controls for radiological effluents and radiological environmental monitoring in the Administrative Controls section of the Technical Specifications (TS) consistent with the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. At the same time, the licensee proposed to transfer the procedural details of the Radiological Effluent Technical Specifications (RETS) from the TS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP) for solid radioactive wastes as appropriate. With these changes, the specifications related to RETS reporting requirements were simplified. Finally, changes to the definitions of the ODCM and PCP were proposed consistent with these changes. Guidance on these proposed changes was provided to all power reactor licensees and applicants by Generic Letter (GL) 89-01 dated January 31, 1989. The October 17, 1991, submittal provided clarifying information that did not change the initial proposed no significant hazards consideration.

2.0 EVALUATION

The licensee's proposed changes to the TS are in accordance with the guidance provided in GL 89-01 and are addressed below.

- (1) The licensee has proposed to incorporate programmatic controls for radioactive effluents and radiological environmental monitoring in TS 6.8.4 "Procedures and Programs," of the TS as noted in the guidance provided in GL 89-01. The programmatic controls ensure that programs

are established, implemented, and maintained to ensure that operating procedures are provided to control radioactive effluents consistent with the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50.

- (2) The licensee has confirmed that the detailed procedural requirements addressing Limiting Conditions for Operation, their applicability, remedial actions, associated surveillance requirements, or reporting requirements for the following specifications have been prepared to implement the relocation of these procedural details to the ODCM or PCP. These changes to the ODCM and PCP have been prepared in accordance with the new Administrative Controls in the TS on changes to the ODCM and PCP so that they will be implemented in the ODCM or PCP when this amendment is issued.

<u>SPECIFICATION</u>	<u>TITLE</u>
3/4.3.3.9	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION
3/4.3.3.10	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
3/4.11.1.1	RADIOACTIVE EFFLUENTS: LIQUID EFFLUENTS CONCENTRATION
3/4.11.1.2	RADIOACTIVE EFFLUENTS: LIQUID EFFLUENTS DOSE
3/4.11.1.3	RADIOACTIVE EFFLUENTS: LIQUID RADWASTE TREATMENT SYSTEM
3/4.11.2.1	RADIOACTIVE EFFLUENTS: GASEOUS EFFLUENTS DOSE RATE
3/4.11.2.2	RADIOACTIVE EFFLUENTS: DOSE - NOBLE GASES
3/4.11.2.3	RADIOACTIVE EFFLUENTS: DOSE - IODINE-131, IODINE-133, TRITIUM, AND RADIOACTIVE MATERIAL IN PARTICULATE FORM
3/4.11.2.4	RADIOACTIVE EFFLUENTS: GASEOUS RADWASTE TREATMENT SYSTEM
3/4.11.3	RADIOACTIVE EFFLUENTS: SOLID RADIOACTIVE WASTES
3/4.11.4	RADIOACTIVE EFFLUENTS: TOTAL DOSE
3/4.12.1	RADIOACTIVE ENVIRONMENTAL MONITORING: MONITORING PROGRAM
3/4.12.2	RADIOACTIVE ENVIRONMENTAL MONITORING: LAND USE CENSUS
3/4.12.3	RADIOACTIVE ENVIRONMENTAL MONITORING: INTERLABORATORY COMPARISON PROGRAM
6.9.1.6	ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

- 6.9.1.7 SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT
- 6.15 MAJOR CHANGES TO LIQUID, GASEOUS, AND SOLID RADWASTE TREATMENT SYSTEMS

These procedural details that have been removed from the TS are not required by the Commission's regulations to be included in TS. They have been prepared for incorporation in the ODCM or PCP upon issuance of this license amendment and may be subsequently changed by the licensee without prior NRC approval. Changes to the ODCM and PCP are documented and will be retained for the duration of the operating license in accordance with TS 6.10.2o.

- (3) The licensee has proposed replacing the existing specifications in the Administrative Controls section of the TS for the Annual Radiological Environmental Operating Report, TS 6.9.1.6 for the Semiannual Radioactive Effluent Release Report, TS 6.9.1.7, for the Process Control Program, TS 6.13, and for the Offsite Dose Calculation Manual, TS 6.14, with the updated TSs that were provided in GL 89-01.

The following TS that are included under the heading of Radioactive Effluents have been retained in the TS. This is in accordance with the guidance of GL 89-01.

<u>SPECIFICATION</u>	<u>TITLE</u>
3/4.3.3.10	EXPLOSIVE GAS MONITORING INSTRUMENTATION (Retained existing requirements of this specification)
3/4.11.1.4	LIQUID HOLDUP TANKS
3/4.11.2.5	EXPLOSIVE GAS MIXTURE
3/4.11.2.6	GAS STORAGE TANKS

Several administrative changes were made to the pages affected by this request. Besides page numbers changing due to deletions of some of these specifications, the following administration changes were made:

- (1) Sections 3/4.9.6, 3/4.9.7, and 3/4.9.8 in the Braidwood TS index was repeated on pages XVII and XVIII. These sections were deleted on page XVII to make it consistent with the Byron TS.
- (2) Added definitions 1.9a and 1.19a to index page. Also changed page numbers for definitions 1.23, 1.30 and 1.31 to reflect the text.
- (3) "Motor-Operated Valves Thermal Overload Protection Devices" on top of index page XII for Braidwood was deleted because it was a repeat from page XI.
- (4) On index page XVIII in Byron and Braidwood TS for section 3/4.9.12, the word "System" was deleted to match the title of section 3/4.9.12 in the TS on page 83/4 9-3.

- (5) On index page XIX in Byron and Braidwood TS for Table 5.7-1, an "s" was added to the words Limit to reflect Table 5.7-1 in the TS on page 5-6.
- (6) Deleted "Table 6.2-1a (This Figure Not Used)" from Braidwood index page X and deleted page 6-5a from the TS to match the Byron TS.
- (7) On Byron TS index page VIII Figure 3.4-4b was added and an "a" was added to the titles of Figures 3.4-3a and 3.4-4a. This was done to reflect the TS text.
- (8) In the Byron and Braidwood TS index for specification 6.9.1., Routine Reports, "Radical Peaking Factor Limit Report" was deleted and "Operating Limits Report" and "Criticality Analysis of Byron and Braidwood Station Fuel Storage Racks" were added to reflect TS Section 6.9.1.
- (9) Corrected page number on Byron index for specification 3/4.7.9
- (10) Added TS Sections 3/4.7.10 and 3/4.7.11 to Byron TS and the index to indicate these sections are not being used. This was done to be consistent with the Braidwood TS and to eliminate confusion.
- (11) Moved three lines from Byron TS page 6-18a to 6-18 to make Byron consistent with Braidwood TS.
- (12) Moved TABLE 3.4-1 and specification 3/4.4.7 in Byron index from page VIII to page VII. Also added "High Energy Line Break Isolating Sensors" after TABLE 4.3-9 in page VII. This was done to make Byron and Braidwood TS consistent.
- (13) Added specification 3.3.3.7 to the Byron TS to indicate specification is not used. Also added Table 3.3-11 (this table number is not being used) in the Byron and Braidwood index. This was done to provide consistency between Byron and Braidwood TS and to eliminate possible confusion of a missing specification.
- (14) Braidwood TS 6.9.1.9, on page 6-19, the word PHOENIX was capitalized to make it consistent with Byron TS.

On the basis of the above, the staff finds that the changes included in the proposed TS amendment request are consistent with the guidance provided in GL 89-01. Because the control of radioactive effluents continues to be limited in accordance with operating procedures that must satisfy the regulatory requirements of 10 CFR Part 50, the NRC staff concludes that this change is administrative in nature and there is no impact on plant safety as a consequence. Accordingly, the staff finds the proposed changes acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes in recordkeeping, reporting, or administrative procedures and program requirements. The Commission made proposed determinations that the amendments involve no significant hazards consideration, which were published in the Federal Register (56 FR 37578) on August 7, 1991. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

5.0 CONCLUSION

On the basis of the considerations discussed above, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: W. Wayne Meinke, PRPB/DREP
Thomas G. Dunning, OTSB/DOEA
Robert M. Pulsifer, PDIII-2/DRPW

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