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August 23, 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
Technical Specifications
NRC Docket Nos. 50-454 and 50-455

Dear Mr. Denton:

The following information provides additional justification to support proposed Technical Specification changes for Byron Station as agreed upon at an August 13-16, 1984 meeting between the NRC and Commonwealth Edison.

1. Subject: Diesel Oil Sampling

D. G. Eisenhut's letter to "All Applicants for Operating Licenses and Holders of Construction Permits for Power Reactors" dated July 5, 1983 (Generic Letter 83-26) contained revised Technical Specification Surveillance Requirements for the diesel fuel impurity level tests. Through discussions with other utilities, Byron Station was made aware of efforts being pursued by the Standardized Nuclear Unit Power Plant System (SNUPPS) to propose more prudent Technical Specification Surveillance Requirements with respect to diesel fuel impurity level tests. Having reviewed the NRC Technical Specification revisions and the recommended surveillance requirements/supporting technical justifications resulting from the SNUPPS efforts, we request that the Byron Unit 1 Nuclear Plant Technical Specifications Sections 4.8.1.1.2(d) and (e) be revised as previously submitted July 26, 1984. In addition, we request Sections 4.7.1.2.3(b), 4.7.5.3(b) and 4.7.10.1.2(b) be revised in accordance with the above mentioned Section 4.8.1.1.2(d) and (e) to reference ASTM-D4057-1981 instead of ASTM-D270-1975. This change in standards provides relief to the station in the sampling methods of the diesel oil due to the physical tank configurations. The change will be consistent with the recommended surveillance requirements and supporting technical justifications resulting from the SNUPPS effort as identified in the referenced report, for the sampling of new fuel prior to addition into the tank.

2. Subject: Containment Pressure Hi-1

In conformance with NUREG-0737 requirement II E.4.2 (Containment Isolation Dependability) we propose to reduce the Containment Pressure High Trip Setpoint as noted in Table 3.3-4 item 1c from ≤ 5.0 psig to ≤ 2.7 psig. Based on this change, the Total Allowance value becomes 6.8 psig.

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The proposed value of 2.7 PSIG is based on the following considerations:

- a. Maximum normal containment pressure as given in Technical Specification 3.6.1.4 and also used as an annunciator setpoint in the Control Room 0.3 PSIG
 - b. Channel Statistical Allowance from Statistical Setpoint Study (CAW 6785) 1.4 PSIG
 - c. Additional allowance to prevent spurious SI actuation due to instrument noise and potentially undetected pressure increases above the allowable Tech Spec limit. 1.0 PSIG
- TOTAL 2.7 PSIG

We do not propose to reduce the Allowable Value of 5.8 psig as given in Technical Specification 3.3.1. This Allowable Value was determined in the Statistical Setpoint Study and is below the value of 6.8 used in the FSAR Safety Analysis.

3. Subject: Detector Plateau Curves

Detector plateau curves are obtained by the station to verify that detector high voltage settings are in a plateau region of the response curve (i.e. detector response is essentially independent of slight voltage variations). In addition, the curves provide assistance to the station in evaluating detector performance over many cycles as a means of identifying potential detector degradation by comparison of current cycle response curves to baseline cycle response curves. This comparative review will alert the station to the need for a preventative detector replacement if a failure appears likely.

Technical Specifications, Section 3/4.3.1, Table 4.3-1, REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS require that at least once per 18 months a channel calibration be performed on the Source Range, Intermediate Range and Power channels. One of the items specified in the Table Notations (item 5) for each channel is:

"Detector plateau curves shall be obtained, evaluated and compared to manufacturer's data. For the Intermediate Range and Power Range Neutron Flux channels the provisions of Specifications 4.0.4 are not applicable for entry into MODE 2 or 1."

H. R. Denton

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Manufacturer's data does not exist for the specific detectors installed at Byron Station, therefore, Byron Station proposes rewording Table Notation 5 to read as follows:

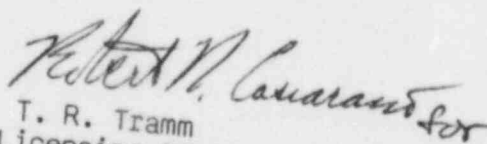
"Initial plateau curves shall be measured for each detector. Subsequent plateau curves shall be obtained, evaluated and compared to the initial curves. For the Intermediate Range and Power Range Neutron Flux channels the provisions of Specification 4.0.4 are not applicable for entry into MODE 2 or 1."

During initial startup, baseline plateau curves will be obtained for the Source Range channels in test 2.52.35A, Operational Alignment of Excore Nuclear Instrumentation (Prior to Core Load) and again in test 2.52.35C, Operational Alignment of Excore Nuclear Instrumentation (Prior to Initial Criticality). Baseline plateau curves will be obtained for the Intermediate Range and Power Range channels in test 2.52.35E, Operational Alignment of Excore Nuclear Instrumentation (At Full Power). This baseline data will be compared to plateau curve data obtained for the channels as required by Table Notation 5.

Should you have any questions regarding this matter, please contact this office.

One signed original and fifteen copies of this letter are provided for NRC review.

Very truly yours,



T. R. Tramm
Nuclear Licensing Administrator

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cc: Byron Resident Inspector
L. N. Olshan - NRR (Telecopy)

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