

Docset file

50-454



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

February 2, 1996

LICENSEE: Commonwealth Edison Company (ComEd)  
FACILITIES: Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2  
SUMMARY: SUMMARY OF NOVEMBER 29, 1995, MEETING TO DISCUSS IMPLEMENTATION OF IMPROVED STANDARD TECHNICAL SPECIFICATIONS AT BYRON AND BRAIDWOOD STATIONS

On November 29, 1995, the NRC staff met with representatives of Commonwealth Edison Company (ComEd, the licensee) to discuss ComEd's plan for implementation of the Improved Standard Technical Specifications (ISTS) at the Byron and Braidwood sites. Enclosure 1 is a list of meeting participants. Enclosure 2 is a copy of the licensee's handout used in the discussions.

The licensee discussed the status of Byron's and Braidwood's current technical specifications (TSs) and the benefits associated with conversion to ISTS. The licensee also outlined the project plan for conversion to ISTS and described their milestone schedule which establishes a submittal date of July 1996 with implementation during the second half of 1997. The Byron and Braidwood ISTS package will be the third one submitted for ComEd and the licensee indicated that it was incorporating the lessons learned from recent industry experience as well as from the other ComEd plants (Zion and LaSalle).

The staff indicated that it appeared that the licensee had followed industry experience to date and stressed the need for the licensee to continue to work with the owners group, NEI, and other plants preparing conversions to minimize the amount of Byron and Braidwood unique material that could hamper a timely review of the conversion application. Because most of the industry will be doing the conversion and the submittals will be made within a short period of time, it is the staff's goal to have the review of the conversions to be as efficient as possible. To that end the staff is also working with industry groups to develop a common and consistent numbering system as well as a common electronic information exchange system for communication between the licensees and the staff.

The staff requested that the licensee include with its submittal, a good matrix showing the correlations between the current TSs and the ISTS to enhance efficiency and maintain the review time as short as possible. The staff indicated the need to coordinate implementation with Region III

9602060365 960202  
PDR ADOCK 05000454  
P PDR

NRC FILE CENTER COPY

DFO

personnel and the Resident Inspectors at the sites. The staff also indicated that implementation of the ISTS is smoother if done before an outage rather than when the plant is coming out of an outage.

Original signed by:

George F. Dick, Jr., Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455,  
STN 50-456, STN 50-457

Enclosures: 1. List of Meeting Attendees  
2. Licensee's Handout

cc w/encls: See next page

Distribution

w/enclosure 1 only:

W. Russell/F. Miraglia  
R. Zimmerman  
J. Roe (JWR)  
R. Capra  
R. Assa  
OGC, 015-B18  
E. Jordan, T4-D18  
C. Grimes, 011-E22  
ACRS, T2-E26  
B. McCabe, 017-G21

w/enclosures 1 and 2

Docket File  
PUBLIC  
PDIII-2 r/f  
G. Dick  
L. Miller, RIII

DOCUMENT NAME: G:\CMVLJR\BRAID-BY\ISTS.MTS

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

OFFICE	LA:PD III-2	N	PM:PDIII-2/	E	D:PDIII-2	E	
NAME	CMOORE		GDICK:avl		RCAPRA	Roe	
DATE	02/ /96		02/02/96		02/2/96		

OFFICIAL RECORD COPY

Byron/Braidwood Power Stations

cc:

Mr. D. L. Farrar  
Manager, Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, Illinois 60515

Mr. William P. Poirier, Director  
Westinghouse Electric Corporation  
Energy Systems Business Unit  
Post Office Box 355, Bay 236 West  
Pittsburgh, Pennsylvania 15230

Joseph Gallo  
Gallo & Ross  
1250 Eye St., N.W.  
Suite 302  
Washington, DC 20005

Michael I. Miller, Esquire  
Sidley and Austin  
One First National Plaza  
Chicago, Illinois 60603

Howard A. Learner  
Environmental law and Policy  
Center of the Midwest  
203 North LaSalle Street  
Suite 1390  
Chicago, Illinois 60601

U.S. Nuclear Regulatory Commission  
Byron Resident Inspectors Office  
4448 North German Church Road  
Byron, Illinois 61010-9750

Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, Illinois 60532-4351

Ms. Lorraine Creek  
Rt. 1, Box 182  
Manteno, Illinois 60950

Chairman, Ogle County Board  
Post Office Box 357  
Oregon, Illinois 61061

Mrs. Phillip B. Johnson  
1907 Stratford Lane  
Rockford, Illinois 61107

George L. Edgar  
Morgan, Lewis and Bochius  
1800 M Street, N.W.  
Washington, DC 20036

Ms. Bridget Little Rorem  
Appleseed Coordinator  
117 North Linden Street  
Essex, Illinois 60935

Attorney General  
500 South Second Street  
Springfield, Illinois 62701

EIS Review Coordinator  
U.S. Environmental Protection Agency  
77 W. Jackson Blvd.  
Chicago, Illinois 60604-3590

Illinois Department of  
Nuclear Safety  
Office of Nuclear Facility Safety  
1035 Outer Park Drive  
Springfield, Illinois 62704

Commonwealth Edison Company  
Byron Station Manager  
4450 North German Church Road  
Byron, Illinois 61010

Kenneth Graesser, Site Vice President  
Byron Station  
Commonwealth Edison Station  
4450 N. German Church Road  
Byron, Illinois 61010

U.S. Nuclear Regulatory Commission  
Braidwood Resident Inspectors Office  
Rural Route #1, Box 79  
Braceville, Illinois 60407

Mr. Ron Stephens  
Illinois Emergency Services  
and Disaster Agency  
110 East Adams Street  
Springfield, Illinois 62706

Chairman  
Will County Board of Supervisors  
Will County Board Courthouse  
Joliet, Illinois 60434

Commonwealth Edison Company  
Braidwood Station Manager  
Rt. 1, Box 84  
Braceville, Illinois 60407

Document Control Desk-Licensing  
Commonwealth Edison Company  
1400 Opus Place, Suite 400  
Downers Grove, Illinois 60515

NOVEMBER 29, 1995 MEETING  
IMPLEMENTATION OF IMPROVED STANDARD TECHNICAL SPECIFICATIONS  
LIST OF ATTENDEES

NRC

Christopher Grimes  
Robert Capra  
Ramin Assa  
George Dick

Commonwealth Edison Company

Kenneth Gerling  
Kelly Root  
Harry Pontious

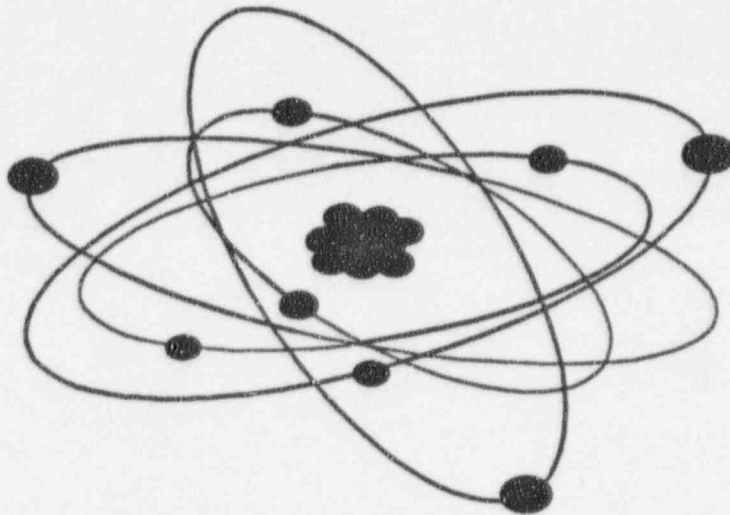
Florida Power and Light

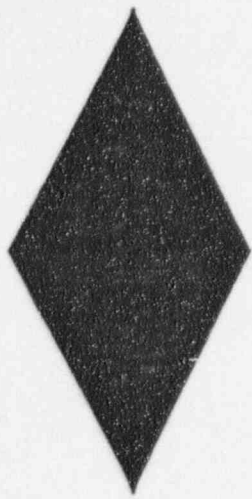
Mike Schoppman



# *CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS*

Byron and Braidwood  
Nuclear Power Stations



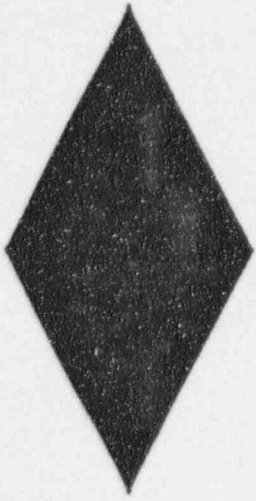


# *INTRODUCTION*

## ● Byron and Braidwood Stations

- ◆ Westinghouse 4 loop PWR Design
- ◆ 1175 MWE Each
- ◆ Byron Unit 1 Licensed in 1984
- ◆ Byron Unit 2 Licensed in 1986
- ◆ Braidwood Unit 1 Licensed in 1987
- ◆ Braidwood Unit 2 Licensed in 1987
- ◆ Located approximately 150 miles apart
- ◆ Currently have common Tech Specs
  - Combine Tech Spec Amendment packages
- ◆ Share most procedures and plant modifications

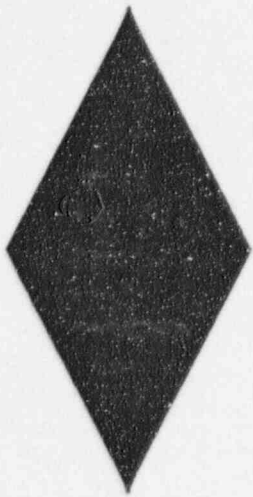




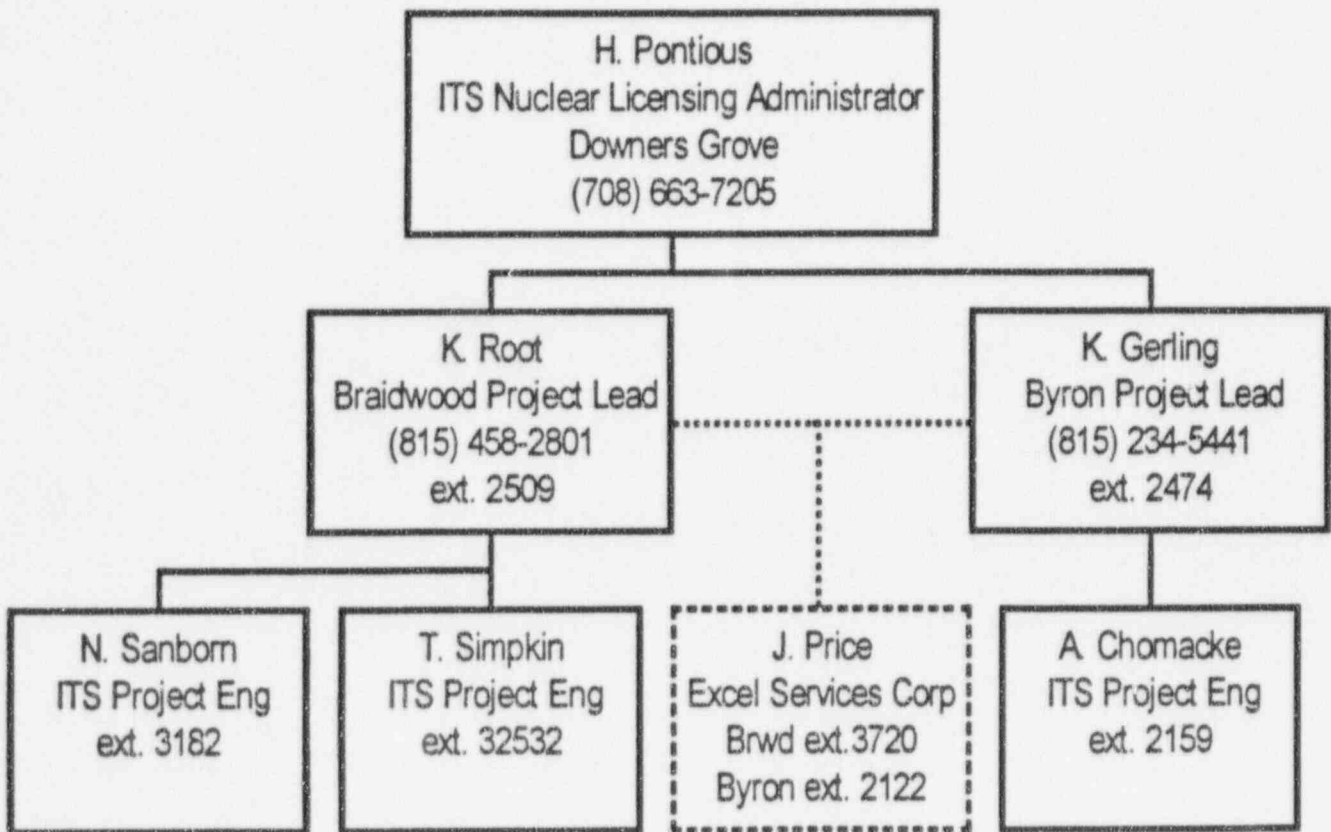
# *INTRODUCTION*

- ITS Conversion Project Lead for Braidwood -- Kelly Root
  - ◆ 11+ Years Nuclear Experience
  - ◆ Held Various Operations positions at Byron and Braidwood Stations
    - Currently SRO Licensed at Braidwood since 1991
- ITS Conversion Project Lead for Byron -- Ken Gerling
  - ◆ 24+ Years Nuclear Experience
  - ◆ Held Various Operations, Training, and Regulatory Positions at Quad-Cities, Byron, and the Production Training Center
    - SRO Licensed at Byron 1985-88, SRO Certified at Braidwood 1988-1994 and Zion in 1979





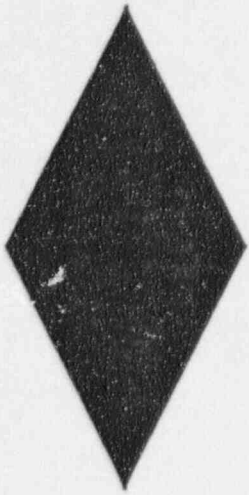
# *Byron/Braidwood ITS Project Organization*





# *OVERVIEW*


- Objectives and Expectations of Today's Discussion
  - ◆ Characterization of Current Byron and Braidwood Tech Specs
  - ◆ Decision to adopt the Improved Tech Specs at Byron and Braidwood Stations
  - ◆ ITS Conversion Project Plan Overview and Current Status
    - Development Phase
    - Review Process
    - Milestone Schedule
    - Implementation Phase



# *OVERVIEW*

## *(CONTINUED)*

- Obtain NRC comments
  - ◆ Amendment submittal process
    - Obtain NRC feedback on amendment submittal process
  - ◆ Submittal format
    - Obtain NRC comments and suggestions as Byron and Braidwood move forward with the ITS conversion
  - ◆ Schedule
- Summary / Conclusions
- Establish framework for any future discussions/meetings



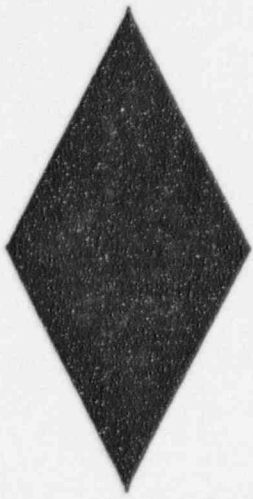
# *CURRENT BYRON AND RAIDWOOD TECH SPECS*

- STANDARD TECH SPECS CHARACTERIZATION:
  - ◆ Presently contains numerous items not related directly to safe reactor operation
  - ◆ Excessive requirements with overly restrictive time clocks
  - ◆ Unclear and confusing Action Statements
  - ◆ Bases Are Not Effective
  - ◆ Need numerous interpretations & clarifications



# DECISION TO CONVERT TO ITS

- Byron and Braidwood Recognized the Potential Benefits of ITS
  - ◆ Review Provided Confirmation of Specific Improvements and Benefits
    - The review was completed by EXCEL Services Corporation
- Review of the Excel information was completed in the '94- early '95 time frame
  - ◆ SVPs recognized the Benefits of converting to ITS at the Regulatory Information Conference held in May 1995
- NRC Notified of Intent to Convert to ITS in May 31, 1995 Letter



# *ITS CONVERSION PROJECT PLAN OVERVIEW*

- MILESTONES

- ◆ DEVELOPMENT PHASE

- Start of Project 7/95 with Development of the SPLIT Report
- Development of ITS Review and Approval Packages
  - Issued for ComEd Review by Section October 1995 - June 1996
  - Packages Done in Parallel with Staggered Start Dates
- ComEd Reviews to include On-Site Review and Off-Site Reviews

- ◆ TOTAL PACKAGE SUBMITTED TO THE NRC FOR REVIEW AND APPROVAL

- July 1996



# *ITS CONVERSION PROJECT PLAN OVERVIEW*

## ◆ IMPLEMENTATION PHASE

- Procedure Identification and Revisions
- Programmatic Changes
  - Technical Requirements Manual (TRM)
  - Bases Controlled Programs
- Training to All Site Personnel (to varying extents)
- Resolve NRC Questions and Comments

## ● GOAL

- ◆ Implementation of ITS at Byron and Braidwood in 1997.





# DEVELOPMENT PHASE DOCUMENTATION

## ● DOCUMENTATION OF THE REVIEW with NRC TECH SPEC SELECTION CRITERIA (SPLIT Report)

- ◆ Items to be Retained in the Tech Specs and Applicable Selection / Inclusion Criteria for Each
- ◆ Items to be Relocated to Licensee Controlled Documents and Justification for Each
- ◆ Comparison with
  - WCAP 11618 (WOG GENERIC)
  - Zion SPLIT Report
  - Vogtle SPLIT Report
- ◆ SPLIT Report completed in August 1995
- PROGRAMMATIC CONTROLS FOR EACH RELOCATED REQUIREMENT
  - ◆ Annotation where Relocated Item is to be maintained
    - Technical Requirements Manual (TRM)
    - Bases Control Programs



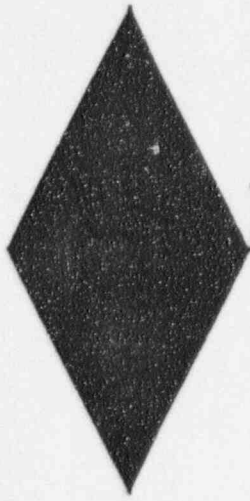
# *DEVELOPMENT PHASE DOCUMENTATION (CONTINUED)*

- GENERATION OF BYRON AND BRAIDWOOD ITS
  - ◆ Consistent with :
    - NUREG 1431 Rev 1
    - Writer's Guide
    - Current Byron and Braidwood Licensing Bases
    - Outstanding Amendment Requests
- COMPARISON OF CURRENT TECH SPECS TO BYRON/BRAIDWOOD ITS
  - ◆ Mark-up of Current Tech Spec Pages
  - ◆ Discussion of Changes/Differences
    - Administrative,
    - More Restrictive,
    - Relocated, or
    - Less Restrictive Changes



# *DEVELOPMENT PHASE DOCUMENTATION (CONTINUED)*

- NSHC
  - ◆ Individual NSHC for Each Change or Group
  
- COMPARISON OF BYRON/  
BRAIDWOOD ITS TO NUREG-1431
  - ◆ NUREG-1431 Rev. 1 is the governing document
  - ◆ Mark-up of NUREG LCO and Bases
  - ◆ Justifications for Differences from the NUREG LCO and Bases to the proposed LCO and Bases
  - ◆ Include WOG and other Owner Group generic travelers as applicable
  - ◆ Address Plant-Specific Tech Specs and Licensing Issues.
  
- CLEAN COPY OF BYRON/  
BRAIDWOOD ITS AND BASES



# ITS REVIEW PROCESS

## *Package Review*

- SUBMIT COMPLETED SECTION FOR CROSS STATION REVIEW
  - ◆ Markup CTS from Lead Plant Review Package
  - ◆ Verify procedures and operating practices are correct
  - ◆ Review ITS Information Requests and submit to appropriate site personnel
  - ◆ Discuss any problems with ITS developer
  - ◆ Develop Matrix for plant differences
- COMPLETED SECTION ISSUED FOR TECHNICAL REVIEW (Both Stations)
  - ◆ REVIEWERS
    - On-Site Personnel -- Operations, Site and Systems Engineering, Radiation Protection/Chemistry, Training, Maintenance, Regulatory Assurance, Work Planning, and Site Quality Verification



# PLANT REVIEW PROCESS

## *Package Review (Continued)*

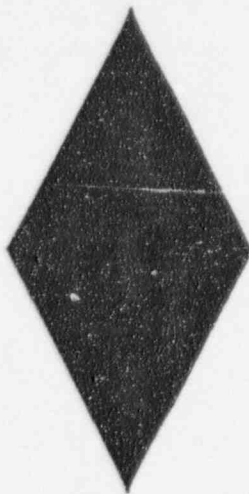
### ◆ REVIEWERS (cont..)

- Off-Site Personnel -- Licensing, Off-Site Safety Review, Nuclear Fuel Services, and Engineering - PRA

### ◆ INDIVIDUAL PACKAGE TECHNICAL REVIEW

- Review Guide / Checklist
  - Certifies that submittal is consistent with plant-specific design and analyses
- Procedure Revision Tracking Form
- Source Document Tracking Form
- Comments Form

### ● INDIVIDUAL PACKAGE ON-SITE REVIEWED



# ***ITS REVIEW PROCESS***

## ***Package Review (Continued)***

- INTEGRATED ITS PACKAGE WILL BE ON-SITE REVIEWED
  - ◆ Any outstanding comments from individual package reviews will be resolved
  - ◆ New generic items incorporated prior to final OSR
- SUBMIT INTEGRATED ITS PACKAGE FOR OFF-SITE REVIEW
  - ◆ Off-Site Reviewers included in individual package reviews
    - Expedites Off-Site Review
    - Involved in Review of Zion ITS Submittal Package

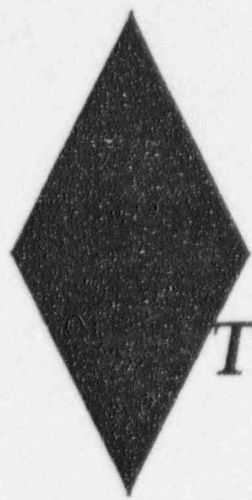




## IMPLEMENTATION PHASE OVERVIEW

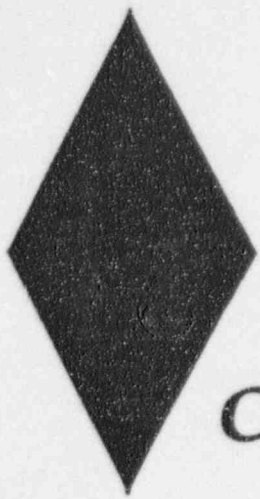
- SUBMIT INTEGRATED ITS PACKAGE TO NRC FOR REVIEW AND APPROVAL
  - ◆ Hard copy
  - ◆ On computer disk in WordPerfect 5.1/5.2 Format
- NRC REVIEW OF ITS AMENDMENT REQUEST
  - ◆ Resolve NRC comments
- IMPLEMENTATION DATE TO BE FINALIZED PRIOR TO SUBMITTAL





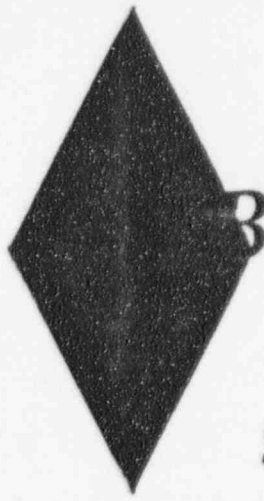
# **IMPLEMENTATION PHASE TRAINING AND PROCEDURE CHANGES**

- **TRAINING AND COMMUNICATIONS**
  - ◆ All Site Personnel -- extent and detail commensurate with job
  - ◆ Training for off-site personnel as necessary
  - ◆ Extensive Operator training
    - Classroom
    - Simulator/Control Room
      - CTS Vs. ITS used in parallel
- **PROCEDURE REVISIONS**
  - ◆ New Procedures
  - ◆ Surveillance test intervals
  - ◆ Administrative changes to reference new tech spec sections
- **TECHNICAL REQUIREMENTS MANUAL**
- **BASES CONTROL PROGRAM**
- **UFSAR REVISIONS**



# *IMPLEMENTATION PHASE CROSS REFERENCES/MATRIX*

- WILL SERVE AS TRACKING MECHANISMS TO ENSURE THAT THE NECESSARY PROCEDURES ARE REVISED AND DEVELOPED
  
- FUTURE AID TO ENSURE ITS SURVEILLANCE REQUIREMENTS CONTINUE TO BE SATISFIED
  
- REFERENCES/MATRICES TO BE GENERATED:
  - ◆ Aid for Site Personnel for Review and use
  - ◆ Aid for NRC Review



# **BYRON AND BRAIDWOOD STATION ITS CONVERSION SUMMARY AND CONCLUSIONS**

- **MAINTAIN FOCUS ON PLANT SAFETY AND REALIZE BENEFITS**
  - ◆ Fewer challenges to safety systems
  - ◆ Increased clarity and understanding
  - ◆ Expanded bases
  - ◆ Re-evaluate current practices
  - ◆ Use industry and station experience
  - ◆ Cost and resource management
    - Reduction in testing
    - Tech spec amendment backlog reduction
    - Make changes to relocated requirements under 10CFR50.59
  
- **“LESSONS-LEARNED” BY OTHER SITES ARE DISCUSSED AND ADDRESSED**
  - ◆ ZION/LASALLE
  - ◆ VOGTLE
  - ◆ GINNA
  - ◆ WOG MINI GROUP MEMBERS



# **BYRON AND BRAIDWOOD ITS CONVERSION SUMMARY AND CONCLUSIONS**

## ● GOALS

- ◆ Submit Conversion Package to NRC by July 1996
- ◆ Implement ITS in 1997
- ◆ NO LERs due to ITS Implementation

## ● FURTHER DISCUSSION/ACTION ITEMS:

- ◆ One Review required for both stations
  - Matrix identifies Differences
- ◆ NRC feedback/suggestions/advice
- ◆ Word Vs. WordPerfect
- ◆ NRC Review Period