



September 20, 1995

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

Subject: Supplement to the Application for Amendment to Facility Operating Licenses:

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

Appendix A, Bases for Technical Specifications 3/4.6.1.7, "Containment Purge Ventilation System"

References: See Attachment 1

Ladies and Gentlemen:

In Reference 1, Commonwealth Edison Company (ComEd) proposed to modify Appendix A, Technical Specification 3.6.1.7, "Containment Purge Ventilation System," for Facility Operating Licenses NPF-37, NPF-66, NPF-72 and NPF-77 to allow for the simultaneous opening of the eight (8) inch containment purge supply and exhaust isolation valves under certain conditions. ComEd proposed to modify Limiting Condition for Operation (LCO) 3.6.1.7b to read as follows:

"The 8-inch containment purge supply and exhaust isolation valve(s) shall be closed except that these valves may be open for purge system operation for reasons such as containment pressure control, reduction of airborne activity,

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respirable air quality considerations for personnel entry, surveillance tests that require the valve(s) to be open, and for other safety-related purposes."

Furthermore, ComEd proposed to modify the Bases for Technical Specification 3.6.1.7 to elaborate as to what would constitute other safety-related purposes:

"Only safety-related reasons such as containment pressure control or the reduction of airborne activity to facilitate personnel access for surveillance or maintenance activities should be used to justify opening these isolation valves. Other safety-related reasons would include maintaining limits set out in the Technical Specifications, Updated Final Safety Analysis Report, code of Federal Regulations, Regulatory Guides, Safety Evaluation Reports or other licensing basis documentation."

Following a conference call held on July 5, 1995, between ComEd and the United States Nuclear Regulatory Commission (NRC) Staff, ComEd submitted Reference 2 to revise the proposed wording of LCO 3.6.1.7b to read as follows:

"The 8-inch containment purge supply and exhaust isolation valve(s) shall be closed, except when the associated penetration(s) is(are) permitted to be open for PURGING or VENTING operations under administrative control."

At that time, ComEd did not propose any additional changes to the Bases of Technical Specification 3.6.1.7 as proposed in Reference 1. ComEd believed that the specificity provided by the proposed Bases would clarify the purposes for which the valves may be opened. However, after further discussions with the Staff ComEd has decided that a revision to the proposed Bases is appropriate. Rather than trying to generate an all inclusive list of the reasons for which the valves may be opened, ComEd determined that it would be more appropriate and straightforward to identify the conditions which must be present in order to open these valves, regardless of the specific reason. ComEd now proposes to revise the Bases to read:

"The 8-inch containment purge supply and exhaust isolation valves may be opened under conditions delineated in administrative procedures. These procedures specify those circumstances under which it is acceptable to open the valves; for example, pressure control or establishment of respirable air quality prior to containment entry. The procedures specify that: (1) the valves must be capable of closing under accident conditions, (2) that the instrumentation for causing isolation of the valves is functioning, and (3) the effluent release will be monitored and that it will be within regulatory limits."

Accordingly, ComEd now proposes to revise Reference 1, Attachment B, Insert 3 as shown in Attachment 2 to this letter.

September 20, 1995

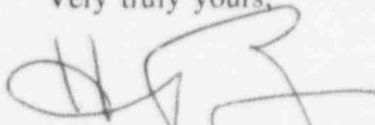
The proposed change in this supplement to our original license amendment request has been reviewed and approved by both On-site and Off-site Review in accordance with ComEd procedures. The No Significant Hazards Consideration (Reference 1, Attachment D) and Environmental Assessment (Reference 1, Attachment E) are not affected by this change.

ComEd is notifying the State of Illinois of this supplement to our license amendment request by transmitting a copy of this letter and its attachments to the designated State Official.

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.

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

Very truly yours,



Harold D. Pontious, Jr.
Nuclear Licensing Administrator

Attachments

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 20th day of September, 1995

by Mary Jo Yack
Notary Public



ATTACHMENT 1

References

- 1) T. W. Simpkin (ComEd) letter to Dr. Thomas E. Murley (NRC), Application for Amendment to Facility Operating Licenses NPF-37, NPF-66, NPF-72 and NPF-77, Appendix A, Technical Specifications, dated May 13, 1993
- 2) Harold D. Pontious, Jr. (ComEd) letter to USNRC Document Control Desk, Supplement to the Application for Amendment to Facility Operating Licenses NPF-37, NPF-66, NPF-72, and NPF-77, Appendix A, Technical Specification 3.6.1.7, "Containment Purge Ventilation System," dated August 11, 1995

ATTACHMENT 2

Insert 3

...PURGING or VENTING operation. The 8-inch containment purge supply and exhaust isolation valves may be opened under conditions delineated in administrative procedures. These procedures specify those circumstances under which it is acceptable to open the valves; for example, pressure control or establishment of respirable air quality prior to containment entry. The procedures specify that: (1) the valves must be capable of closing under accident conditions, (2) that the instrumentation for causing isolation of the valves is functioning, and (3) the effluent release will be monitored and that it will be within regulatory limits.