Commonwealth Edison Company 1400 Opus Place Downers Grove, IL 60515

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ComEd

September 29, 1995

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

Subject: Supplemental Response to Generic Letter 89-13

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

References: See Attachment

Ladies and Gentlemen:

In Reference (2) Commonwealth Edison Company (ComEd) provided its initial response to United States Nuclear Regulatory Commission (USNRC) Generic Letter (GL) 89-13, Reference (1). Byron Nuclear Power Station, Units 1 and 2 (Byron) followed the guidance provided in GL 89-13, Enclosure 1 in response to GL 89-13, Item I. In accordance with GL 89-13, Enclosure 1 Byron is categorized as "Freshwater without clams." Byron committed to performing Surveillance Techniques A and D and Control Techniques B and C as outlined in GL 89-13, Enclosure 1.

Surveillance Technique D states that "[s]amples of water and substrate should be collected annually to determine if Asiatic clams have populated the water source. Water and substrate sampling is only necessary at freshwater plants that have not previously detected the presence of Asiatic clams in their source water bodies. If Asiatic clams are detected, utilities may discontinue this sampling activity if desired, and the chlorination (or equally effective) treatment program should be modified to be in agreement with paragraph B, above." Although the presence of Asiatic clams has not been detected, Byron is going to discontinue its commitments with respect to the performance of Surveillance Technique D since continuous chlorination is already being performed in accordance with Control Technique B.

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Additionally, in response to GL 89-13, Item I Byron committed to begin utilizing sodium bromide in conjunction with sodium hypochlorite in January 1990 to satisfy the requirements of Control Technique B. However, Byron also stated that the current chemical injection system utilizing only sodium hypochlorite was sufficient to satisfy the intent of GL 89-13. In Reference (4), ComEd notified the USNRC that "[d]ue to design problems, the sodium bromide system may not be operational in the future." Byron reiterated that "[c]ontinuous injection of sodium hypochlorite is currently performed and meets the requirements of the generic letter." Furthermore, the Illinois Environmental Protection Agency (IEPA) has restricted the use of bromide biocides in the Byron National Pollutant Discharge Elimination System (NPDES) Permit. Therefore, Byron will not use sodium bromide in conjunction with sodium hypochlorite to satisfy the requirements of Control Technique B.

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

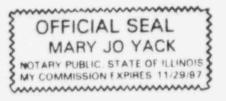
Attachment

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

Signed before me

on this 29th day of September, 1995

by mary Public



ATTACHMENT

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References

- Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment," dated July 18, 1989
- M. H. Richter (ComEd) letter to USNRC Document Control Desk, "Commonwealth Edison Company Response to Generic Letter 89-13," dated January 29, 1990
- 3. Generic Letter 89-13, Supplement 1, "Service Water System Problems Affecting Safety-Related Equipment," dated April 4, 1990
- D. L. Taylor (ComEd) letter to USNRC Document Control Desk, "Commonwealth Edison Company Supplemental Response to Generic Letter 89-13, " dated November 14, 1990
- D. L. Taylor (ComEd) letter to USNRC Document Control Desk, "Byron Station Supplemental Response to Generic Letter 89-13, " dated January 25, 1991
- T. K. Schuster (ComEd) letter to USNRC Document Control Desk, "Byron Station Supplemental Response to Generic Letter 89-13, " dated March 13, 1992