

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 1 TO FACILITY OPERATING LICENSE NPF-23

COMMONWEALTH EDISON COMPANY

BYRON STATION, UNIT 1

DOCKET NO. STN 50-454

Introduction

By letter dated January 18, 1985 Commonwealth Edison Company (the licensee) proposed an amendment to the Technical Specifications (TSs) appended to Facility Operating License No. NPF-23 for Byron Station, Unit 1. The proposed amendment was telecopied to the NRC on January 18, 1985 and verbally approved by the Assistant Director for Licensing later that day. The amendment adds a footnote to Table 3.6-1, Containment Isolation Valves, that allows certain valves to be opened on an intermittent basis under administrative control.

Background and Evaluation of Emergency Circumstances

The Westinghouse Standard Technical Specifications (NUREG-0452) in the table of containment isolation valves contains a footnote that allows certain valves to be opened intermittently under administrative control. The footnote was inadvertently omitted from the Byron TSs.

On January 18, 1985, the licensee was going to control secondary water system chemistry by injecting hydrazine through valves IFW015A, B, C and D. The plant was in Mode 3 which requires that containment integrity be maintained; with the omission of the aforementioned footnote, these four valves could not be opened. Proper secondary water system chemistry is needed to limit the amount of corrosion in the steam generators. In order to open these valves under the TSs that existed, the licensee could have cooled the plant down to Mode 5 because containment integrity is not required in Mode 5. Instead, the licensee submitted the proposed amendment. Eight other valves (1RH8701A and B, 1RH8702A and B, and 1MS021A, B, C and D) were also included since they might also have to be opened in the near future.

Considering the potential corrosion of the steam generators, the delay that might have been incurred and the fact that the footnote was inadvertently omitted in the original TSs, emergency action was taken to approve the application. Therefore, although the State of Illinois was informed by telephone of the action prior to NRC approval, no prior notice of the action was published.

Discussion and Evaluation

The licensee proposed to change TS Table 3.6-1, Containment Isolation Valves, to add a footnote to twelve valves, which would state that these valves "may be opened on an intermittent basis under administrative control." These containment isolation valves are required by the current Technical Specifications to be closed during Modes 1 through 4. TS 3.6.1.1, Containment Integrity, requires containment integrity to be maintained during Modes 1 through 4, and TS 1.7, which reflects GDC 55, 56, and 57, defines containment integrity as existing in part, when all penetrations required to be closed during accident conditions are either: (1) capable of being closed by operable automatic containment isolation valves, or (2) closed by manual valves, blind flanges or deactivated automatic valves secured in their closed positions, except as provided in TS Table 3.6-1. Thus, the proposed footnote would permit the twelve valves to be opened on an intermittent basis under administrative control, during Modes 1 through 4. This is necessary for proper operation of the plant, and the Standard Technical Specifications (NUREG-0452) contain this footnote. The valves in question are:

1FW015A, B, C, D - chemical feedlines to steam generators

1M5021A, B, C, D - drain valves in the main steamlines

1RH8701A, B - RHR suction lines from the RCS 1RH8702A, B

The chemical feedlines are required to be opened to maintain steam generator chemistry within required limits in Modes 3 and 4 (hot standby and hot shutdown). The main steam line drain valves must be periodically opened to drain the main steam system. The RHR suction lines must be opened during reactor cooldown so that the plant may be shutdown. Thus, it is necessary and acceptable that the subject valves be permitted to be opened on an intermittent basis, under administrative control, and the staff finds the licensee's proposed TS change to be acceptable.

Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to $10 \ \text{CFR} \ \S 51.5 \ (d)(4)$, that an environmental impact statement, or negative declaration and environmental impact appraisal, need not be prepared in connection with issuance of this amendment.

Final No Significant Hazards Consideration Determination

The State was informed by telephone on January 18, 1985 of our proposed no significant hazards consideration and had no comments. Based on our review of the licensee's submittal as described in our above evaluation and for the reasons stated below, we have made a final determination that the licensee's amendment request does not involve a significant hazards consideration.

The Commission has provided guidance for the application of the criteria in 10 CFR 50.92 by providing examples of amendments that are considered not likely to involve significant hazards considerations (48 FR 14870); example (i) lists correction of an error. The omission of the footnote in the Byron TSs was clearly an error: the footnote is included in the standard TSs and reference to the exceptions allowed by the footnote are contained in the Byron TS Section 1.7.a.2). Therefore, the Commission has determined that the application does not involve a significant hazards consideration.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: January 28, 1985

The following NRC personnel have contributed to this Safety Evaluation: J. Pulsipher L. Olshan