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October 19, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Byron Generating Station Unit 1
Completion of Preoperational
Test Program
NRC Docket No. 50-454

References (a): September 28, 1984 letter from L. O.
DelGeorge to H. R. Denton.

(b): October 27, 1983 letter from T. R. Tramm
to H. R. Denton.

Dear Mr. Denton:

This letter provides minor changes to the list of testing deficiencies to be completed after the Byron 1 fuel load. The original list was provided in reference (a).

Attachment A to this letter supplements and revises the list of testing deficiencies to be completed after fuel load. Several safety injection check valves have been added to the list for SI test 73.13 because Region III I&E inspectors have determined that these valves should have been tested at a higher backpressure to satisfy Technical Specification requirements. The VC 85.10 control room ventilation deficiency has been rewritten because the post-test review of the differential pressure data disclosed that the instrumentation accuracy was sufficient to confirm positive pressurization, but insufficient to confirm the 1/8" differential.

The resolution of these additional and revised test deficiencies can be safely deferred for the limited period proposed for the reasons described in reference (a).

Please address further questions regarding this matter to this office.

Very truly yours,

T. R. Tramm
Nuclear Licensing Administrator

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ATTACHMENT B

TESTING DEFICIENCIES TO BE COMPLETED AFTER FUEL LOAD

<u>Test</u>	<u>Description</u>	<u>Tech Spec Applicability</u>	<u>Completion Required Prior To</u>
SI 73.13	ISI8900A leakage \leq 1 gpm not demonstrated at 2235 psig RCS pressure.	Mode 2	Initial Criticality (Mode 2)
	ISI8900B leakage \leq 1 gpm not demonstrated at 2235 psig RCS pressure.	Mode 2	Initial Criticality (Mode 2)
	ISI8919A leakage \leq 1 gpm not demonstrated at 2235 psig RCS pressure.	Mode 2	Initial Criticality (Mode 2)
	ISI8919B leakage \leq 1 gpm not demonstrated at 2235 psig RCS pressure.	Mode 2	Initial Criticality (Mode 2)
	ISI8919C leakage \leq 1 gpm not demonstrated at 2235 psig RCS pressure.	Mode 2	Initial Criticality (Mode 2)
	ISI8919D leakage \leq 1 gpm not demonstrated at 2235 psig RCS pressure.	Mode 2	Initial Criticality (Mode 2)
	ISI8956C leakage \leq 1 gpm not demonstrated at 2235 psig RCS pressure.	Mode 2	Initial Criticality (Mode 2)
	ISI8956D leakage \leq 1 gpm not demonstrated at 2235 psig RCS pressure.	Mode 2	Initial Criticality (Mode 2)
	STATUS: Components tested at less than 1700 psig. Retest requires operating plant conditions.		BASIS: Leakage \leq 1gpm demonstrated at \leq 1700 psig. Valves shall be demonstrated OPERABLE prior to entering Mode 2 per requirements of Tech Spec Section 4.4.6.2.2. Tech Spec Section 4.4.6.2.2.
VC 85.10 Control Room Ventilation	Control room boundary differential pressure of 1/8 in. w.g. not achieved. STATUS: A positive differential pressure with respect to ambient has been established during operation of redundant Train B. Train A balancing damper adjustments in process. A 1/8 inch w.g. differential relative to auxiliary building surrounding areas requires the auxiliary building ventilation system (VA). See reference (b).	Mode 6	For Train A, a positive differential pressure with respect to ambient will be completed prior to initial criticality (Mode 2). For Train A and B, 1/8 inch w.g. differential with respect to surrounding areas will be obtained prior to accumulating 10 effective full power days at power levels not exceeding 25% power. BASIS: Fission product inventory is trivial in comparison to the inventories employed by FSAR Safety Analysis, and therefore, will not threaten Control Room habitability. See reference (b).