



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

October 20, 1984

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

Subject: Byron Generating Station Units 1 and 2
Draft License NPF-23
NRC Docket No. 50-454

Reference (a): October 18, 1984 letter T. M. Novak
to D. L. Farrar

Dear Mr. Denton:

This letter provides Commonwealth Edison comments on the draft of the Byron 1 license which was sent to us in Reference (a). We urge that the comments in Attachment A to this letter be carefully considered before the license is finalized.

We are available to discuss these matters in more detail if necessary. Further discussions are needed if any of these comments are not incorporated into the license.

Very truly yours,

T. R. Tramm
Nuclear Licensing Administrator

Attachments

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ATTACHMENT A

Comments on Draft License

License Condition 1: Maximum Power Level

This license should be issued for the full power level, 3411 megawatts thermal, with 5% limitation pending Commission approval. Such a License Condition would not need revision unless the Commissioners approve operation at less than full power. If only a 5% license is to be issued at this point, the following draft License Conditions are meaningless: 3(c), 3(d), 3(f), 6(d), 6(e), 6(f), 6(g), 7, 8, 9, 11, 13, 16, 18, 20, 21, and 22.

License Condition 2: Technical Specifications and Environmental Protection Plan

Our comments on the Technical Specifications have been provided to the Staff in review meetings. The Environmental Protection Plan is acceptable.

License Condition 3: Post-Fuel-Loading Initial Test Program

The requirement to obtain NRC approval if the test program is delayed should be modified to permit continued operation of the plant at a given power level if the results of the startup tests to that plateau are properly reviewed by Commonwealth Edison and found acceptable within the specified time periods. Continued power operation during an unexpected delay will not endanger the public health and safety as long as the test results are satisfactory. For example, a breakdown of secondary side pumps or heat exchangers which imposes a temporary power limitation would raise no new safety issue.

License Condition 5: Equipment Qualification

The requirement to reevaluate the environmental conditions resulting from a HELB outside containment should be deleted. A preliminary evaluation was provided by letter dated October 18, 1984 from T. R. Tramm to H. R. Denton which contained our commitment to further review of this issue. The results of preliminary evaluations were also provided which indicated that there is reasonable assurance that the reactor can be operated safely while more detailed analyses are completed and reviewed.

License Condition 6: Fire Protection Program

Conditions 6(a) and 6(d) should be revised to indicate that our approved fire protection program also includes provisions

described in letters dated August 20, 1984, October 11, 1984 and October 15, 1984 from T. R. Tramm to H. R. Denton.

Condition 6(c) should be revised to require that changes to the fire protection program be reported on a schedule consistent with changes which are reported pursuant to 50.59. This will greatly simplify our reporting task and make NRC reporting requirements more uniform.

Condition 6(c) should also be revised to allow for changes to the Fire Protection Report (FPR) which make the report self-consistent and do not alter the conclusions of the analysis of fire hazards. For example, the current report contains figures which identify certain exterior walls as fire barriers. Where the analyses discussed in the FPR show that fire protection is adequate without these fire barriers, we do not intend to maintain these walls as fire barriers. The figures in the FPR will be revised but no additional NRC review needs to be performed.

License Condition 7: Control Room Human Factors

This Condition should be revised to specify panels 1PM07J and 1PM05J rather than IPM07J and IPM05J.

License Condition 9: TMI Item II.F.1

This Condition should be revised to require operability of the iodine/particulate sampling system through the first refueling cycle. By letter dated August 17, 1984 from T. R. Tramm to H. R. Denton we are committed to resolution of questions arising from recent research regarding the adequacy of these systems.

License Condition 11: Emergency Planning

This Condition should be deleted. All three of these requirements of the ASLB's Initial Decision have been completed. Letters dated August 16, 1984 from T. R. Tramm to H. R. Denton and October 12, 1984 from T. R. Tramm to H. R. Denton provide documentation of the completion of these tasks.

License Condition 12: Reliability of Diesel Generators

This Condition should be deleted. By letter dated October 16, 1984 from T. R. Tramm to H. R. Denton we provided the results of our further evaluation of the effects of diesel engine vibration on the panel-mounted controls and instrumentation. No changes were found to be necessary.

License Condition 15: Formal FEMA Finding

This Condition should be deleted. Existing regulations already provide for this eventuality.

License Condition 16: Protection Against Postulated Breaks or Cracks in High Energy and Moderate Energy Lines

This Condition should be revised to acknowledge that FSAR Section 3.6.2 is being revised in accordance with commitments made in response to IDI/IDR findings. Advance copies of these FSAR revisions were provided by letter dated October 19, 1984 from T. R. Tramm to H. R. Denton.

License Condition 18: Control Room Ventilation Systems

This Condition should be revised to delete reference to the filters in the recirculation portion of the control room ventilation system. Modifications to this system have been discussed with the NRC Staff which would make consideration of these charcoal filters unnecessary in evaluations of accident doses.

License Condition 19: Turbine Missiles

This Condition should be deleted. By letter dated September 26, 1984, from T. R. Tramm to H. R. Denton, Commonwealth Edison committed to a program of turbine maintenance which includes inspection of all three low pressure turbine rotors within the first 3 and 1/2 operating years based on manufacturer's calculations. Subsequent intervals will also be based upon the manufacturer's calculations.

License Condition 20: Steam Generator Tube Rupture

This Condition should be deleted. By letter dated October 12, 1984 from T. R. Tramm to H. R. Denton, Commonwealth Edison committed to resolution of outstanding NRC generic questions regarding steam generator tube rupture analyses in conjunction with the owner's group effort. The analytical work is scheduled to be completed by May, 1985. This commitment includes all necessary Technical Specification revisions.

License Condition 21: Reactor Systems Technical Specification

This Condition should be deleted. By letter dated October 11, 1984 from T. R. Tramm to H. R. Denton, Commonwealth Edison

committed to resolution of outstanding Reactor Systems Branch generic questions regarding Technical Specifications in conjunction with owner's group efforts. The schedule for completion of this effort is uncertain.

License Condition 22: Energy Absorbing Material

We understand that this license condition will be deleted from this list and added to the list in Attachment 1 which is incorporated by License Condition 1.

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