



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

October 23, 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
Braidwood Generating Station Units 1 and 2
Technical Specifications
NRC Docket Nos. 50-454/455 and 50-456/457

- References (a): August 27, 1984 letter from B. J. Youngblood
to D. L. Farrar.
- (b): October 12, 1984 letter from B. J. Youngblood
to D. L. Farrar.
- (c): October 19, 1984 letter from B. J. Youngblood
to D. L. Farrar.
- (d): October 23, 1984 letter from T. R. Tramm
to H. R. Denton.
- (e): May 2, 1984 letter from L. O. DelGeorge
to H. R. Denton.

Dear Mr. Denton:

This letter provides Commonwealth Edison's confirmation that the Technical Specifications which have been prepared for Byron 1 accurately reflect the as-built plant and the FSAR. This confirmation is submitted to satisfy the request made by the NRC in reference (a).

The version of the Byron Technical Specifications which has been reviewed is the "final draft" which was issued via reference (b) and modified by reference (c) with the changes proposed by Commonwealth Edison in reference (d). The following corporate and station departments at Commonwealth Edison participated in the review: Project Engineering, Technical Services-Nuclear, Station Electrical Engineering, Nuclear Fuel Services, Nuclear Licensing, Byron Technical Staff, Byron Training, Byron Operating, Byron Maintenance, Byron Radiation Chemistry, and Nuclear Safety. Personnel involved in this review included SRO's licensed previously at other stations, and Shift Control Room Engineers (Shift Technical Advisors) and SRO's currently licensed at Byron. Changes necessitated by these reviews have been discussed with the NRC Staff and agreed upon.

8411080215 841023
PDR ADOCK 05000454
A PDR

Boo1
1/0

October 22, 1984

Based upon our extensive, in-depth review we believe that the Byron 1 Technical Specifications accurately reflect the as-built plant and the Byron/Braidwood FSAR as amended by Amendment 45 and including the changes provided by reference (d). To confirm our review regarding the correctness of the Technical Specifications, Westinghouse and Sargent & Lundy have been requested to perform for us an additional review of those Tech Specs affecting systems, components and structures within their areas of responsibility.

There are certain Technical Specification requirements, such as surveillance times, which are patterned after the Westinghouse Standardized Technical Specifications and are not directly linked to specific FSAR analyses. To the extent that we can demonstrate such requirements to be unnecessarily conservative, we intend to propose Technical Specification changes in the future. One set of such changes was already proposed in reference (e).

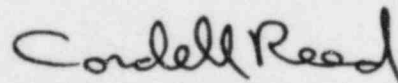
All of the safety limits, LCO's and setpoints specified in the technical specifications are based upon conservative analyses. To the extent that those analysis are unnecessarily conservative, we may be proposing specific changes to redefine those limits. Changes to correct overly conservative technical specifications may also be proposed as experience is gained through the performance of those surveillances and as the Technical Specifications are implemented during the startup program.

We have also reviewed the Technical Specification against our understanding of the Staff's SER and comments received from your contractor, EG&G, on eight sections of the Technical Specifications. We are not aware of any changes required to the Technical Specifications based on this review.

To the best of my knowledge and belief the statements contained herein are true and correct. In some respects, these statements are not based on my personal knowledge but upon information received from other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If there are any further questions regarding this matter, please contact this office.

Very truly yours,



Cordell Reed
Vice President