



Commonwealth Edison

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February 20, 1985

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
Technical Specifications
NRC Docket Nos. 50-454 and 50-455

Dear Mr. Denton:

This letter provides confirmation of actions which will be taken to implement the revised Technical Specification requirements for testing of the Byron reactor protection system instrumentation. We understand that the NRC's issuance of the revised surveillance requirements is based upon our commitment to completion of these actions.

In the February 14, 1985 version of the Byron Technical Specifications the frequency of analog channel operational surveillance tests for the reactor protection system instrumentation was revised from monthly to quarterly. This change was originally proposed by the Westinghouse Owners Group and justified in WCAP-10271, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System." In implementing this change at Byron Station, the following actions will be taken within 60 days to satisfy NRC concerns:

1. Instrument drift will be monitored for the instruments which are calibrated quarterly for a period of about one year. This information will be used to verify the adequacy of the drift allowance in the statistical setpoint study.
2. Failures of instruments subject to quarterly analog channel operational testing will be reviewed during the first year for possible common mode failures.
3. The quarterly analog channel tests on redundant instruments will be performed throughout the quarter to minimize the possibility of undetected common mode failures. Redundant channels will not be tested on the same day by the same instrument mechanics using the same test instruments.

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H. R. Denton

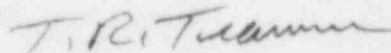
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Please contact this office immediately if these commitments are inadequate.

One signed original and fifteen copies of this letter are provided for NRC review.

Very truly yours,



T. R. Tramm
Nuclear Licensing Administrator

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