

ATTACHMENT A

PROPOSED CHANGES TO APPENDIX A,

TECHNICAL SPECIFICATIONS OF FACILITY

OPERATING LICENSES NPF-37, NPF-66, NPF-72, and NPF-75

Byron Station

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Braidwood Station

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TABLE 3.3-13 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION[#]

	<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABILITY</u>	<u>ACTION</u>
3.	Gaseous Waste Management System			
a.	Hydrogen Analyzer (OAT-GW8000)	1	**	38
b.	Oxygen Analyzer (OAIT-GW004 and OAT-GW003) (OAT-GW8003)	1	**	38
c.	Waste Gas Compressor Discharge Oxygen Analyzer (OAIT-GW004)	1	***	38
4.	Gas Decay Tank System			
a.	Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release (ORE-PR002A and 2B)	2	*	35
5.	Containment Purge System			
a.	Noble Gas Activity Monitor - Providing Alarm (RE-PR001B)	1	*	37
b.	Iodine Sampler (RE-PR001C)	1	*	40
c.	Particulate Sampler (RE-PR001A)	1	*	40
6.	Radioactivity Monitors Providing Alarm and Automatic Closure of Surge Tank Vent-Component Cooling Water Line (ORE-PR009 and RE-PR009)	2	*	41

BYRON - UNITS 1 & 2

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TABLE 3.3-13 (Continued)

TABLE NOTATIONS

*At all times.

**During WASTE GAS HOLDUP SYSTEM operation.

All instruments required for Unit 1 or Unit 2 operation.

*** During Waste Gas Compressor Operation.

ACTION STATEMENTS

ACTION 35 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the tank(s) may be released to the environment for up to 14 days provided that prior to initiating the release:

- a. At least two independent samples of the tank's contents are analyzed, and
- b. At least two technically qualified members of the facility staff independently verify the release rate calculations and discharge valve lineup.

Otherwise, suspend release of radioactive effluents via this pathway.

ACTION 36 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided the flow rate is estimated at least once per 4 hours.

ACTION 37 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, immediately suspend PURGING of radioactive effluent via this pathway.

ACTION 38 - With the number of channels OPERABLE ~~one~~ less than required by the Minimum Channels OPERABLE requirement, operation of this system may continue ~~provided grab samples are taken and analyzed at least once per 24 hours.~~ With both channels inoperable, operation may continue provided grab samples are taken and analyzed at least once per 4 hours during degassing operations and at least once per 24 hours during other operations.

ACTION 39 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are taken at least once per 12 hours and these samples are analyzed for radioactivity within 24 hours.

TABLE 4.3-9 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS[#]

FUNCTIONAL UNIT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	DIGITAL CHANNEL OPERATIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
2. Plant Vent Monitoring System - Unit Two (continued)					
d. Effluent System Flow Rate Measuring Device (LOOP-VA020)	D	N.A.	R ^{##}	Q	*
e. Sampler Flow Rate Measuring Device (2FI-PR165)	D	N.A.	R ^{##}	Q	*
3. Gaseous Waste Management System					
a. Hydrogen Analyzer (OAT-GW8000)	D	N.A.	Q(4)	M	**
b. Oxygen Analyzer (OAT-GW8003)	D	N.A.	Q(5)	M	**
c. Waste Gas Compressor Discharge Oxygen Analyzer (OAT-GW004 and OAT-GW003)	D	N.A.	Q(5)	M	***
4. Gas Decay Tank System					
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release (ORE-PR002A and 2B)	P	P	R(3) ^{##}	Q(1)	*
5. Containment Purge System					
a. Noble Gas Activity Monitor - Providing Alarm (RE-PR001B)	D	P	R(3) ^{##}	Q(2)	*
b. Iodine Sampler (RE-PR001C)	P	P	R(3) ^{##}	N.A.	*
c. Particulate Sampler (RE-PR001A)	P	P	R(3) ^{##}	N.A.	*

BYRON - UNITS 1 & 2

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TABLE 4.3-9 (Continued)

TABLE NOTATIONS

*At all times.

**During WASTE GAS HOLDUP SYSTEM operation.

#All instruments required for Unit 1 or Unit 2 operation.

##The specified 18 month interval may be extended to 32 months for Cycle 1 only.

*** During Waste Gas Compressor Operation

(1) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:

- a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or
- b. Circuit failure (monitor loss of communications - alarm only, detector loss of counts, or monitor loss of power), or
- c. Detector check source test failure, or
- d. Detector channel out-of-service, or
- e. Monitor loss of sample flow.

(2) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

- a. Instrument indicates measured levels above the Alarm Setpoint, or
- b. Circuit failure (monitor loss of communications - alarm only, detector loss of counts, or monitor loss of power), or
- c. Detector check source test failure, or
- d. Detector channel out-of-service, or
- e. Monitor loss of sample flow.

(3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.

(4) The CHANNEL CALIBRATION shall include the use of standard gas samples containing hydrogen and nitrogen.

(5) The CHANNEL CALIBRATION shall include the use of standard gas samples containing oxygen and nitrogen.

PRAIDWOOD - UNITS 1 & 2

TABLE 3.3-13 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION[#]

	<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABILITY</u>	<u>ACTION</u>
3.	Gaseous Waste Management System			
	a. Hydrogen Analyzer (OAT-GW8000)	1	**	38
	b. Oxygen Analyzer (OAT-GW004 and OAT-GW8003) (OAT-GW8003)	1	**	38
	c. Waste Gas Compressor Discharge Oxygen Analyzer (OAT-GW004)	1	***	38
4.	Gas Decay Tank System			
	a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release (ORE-PROG2A and 2B)	2	*	35
5.	Containment Purge System			
	a. Noble Gas Activity Monitor - Providing Alarm (RE-PR001B)	1	*	37
	b. Iodine Sampler (RE-PR001C)	1	*	40
	c. Particulate Sampler (RE-PR001A)	1	*	40
6.	Radioactivity Monitors Providing Alarm and Automatic Closure of Surge Tank Vent-Component Cooling Water Line (ORE-PR009 and RE-PRC09)	2	*	41

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TABLE 3.3-13 (Continued)

TABLE NOTATIONS

*At all times.

**During WASTE GAS HOLDUP SYSTEM operation.

#All instruments required for Unit 1 or Unit 2 operation.

*** During Waste Gas Compressor Operation

ACTION STATEMENTS

ACTION 35 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the tank(s) may be released to the environment for up to 14 days provided that prior to initiating the release:

- a. At least two independent samples of the tank's contents are analyzed, and
- b. At least two technically qualified members of the facility staff independently verify the release rate calculations and discharge valve lineup.

Otherwise, suspend release of radioactive effluents via this pathway.

ACTION 36 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided the flow rate is estimated at least once per 4 hours.

ACTION 37 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, immediately suspend PURGING of radioactive effluents via this pathway.

ACTION 38 - With the number of channels OPERABLE ~~one~~ less than required by the Minimum Channels OPERABLE requirement, operation of this system may continue ~~provided grab samples are taken and analyzed at least once per 24 hours.~~ With both channels inoperable, operation may continue provided grab samples are taken and analyzed at least once per 4 hours during degassing operations and at least once per 24 hours during other operations.

ACTION 39 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are taken at least once per 12 hours and these samples are analyzed for radioactivity within 24 hours.

TABLE 4.3-9 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS[#]

FUNCTIONAL UNIT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	DIGITAL CHANNEL OPERATIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
2. Plant Vent Monitoring System - Unit Two (continued)					
d. Effluent System Flow Rate Measuring Device (LOOP-VA020)	D	N.A.	R##	Q	*
e. Sampler Flow Rate Measuring Device (2FT-PR165)	D	N.A.	R##	Q	*
3. Gaseous Waste Management System					
a. Hydrogen Analyzer (OAT-GW8000)	D	N.A.	Q(4)	M	**
b. Oxygen Analyzer (OAT-GW8003)	D	N.A.	Q(5)	M	**
c. Waste Gas Compressor Discharge Oxygen Analyzer (OAT-GW8004) Gas Decay Tank System	D	N.A.	Q(5)	M	***
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release (ORE-PRO01A and 2B)	P	P	R(3)##	Q(1)	*
5. Containment Purge System					
a. Noble Gas Activity Monitor - Providing Alarm (RE-PRO01B)	D	P	R(3)##	Q(2)	*
b. Iodine Sampler (RE-PRO01C)	P	P	R(3)##	N.A.	*
c. Particulate Sampler (RE-PRO01A)	P	P	R(3)##	N.A.	*

TABLE 4.3-9 (Continued)

TABLE NOTATIONS

*At all times.

**During WASTE GAS HOLDUP SYSTEM operation.

All instruments required for Unit 1 or Unit 2 operation.

The specified 18 month interval may be extended to 32 months for cycle 1 only.

*** During Waste Gas Compressor Operation

- (1) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 - a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or
 - b. Circuit failure (monitor loss of communications - alarm only, detector loss of counts, or monitor loss of power), or
 - c. Detector check source test failure, or
 - d. Detector channel out-of-service, or
 - e. Monitor loss of sample flow.
- (2) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
 - a. Instrument indicates measured levels above the Alarm Setpoint, or
 - b. Circuit failure (monitor loss of communications - alarm only, detector loss of counts, or monitor loss of power), or
 - c. Detector check source test failure, or
 - d. Detector channel out-of-service, or
 - e. Monitor loss of sample flow.
- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.
- (4) The CHANNEL CALIBRATION shall include the use of standard gas samples containing hydrogen and nitrogen.
- (5) The CHANNEL CALIBRATION shall include the use of standard gas samples containing oxygen and nitrogen.

ATTACHMENT B

DESCRIPTION AND SUMMARY OF PROPOSED CHANGES

The proposed changes involve Technical Specification Tables 3.3-13 and 4.3-9 for the Byron and Braidwood Stations. These changes are being requested to separate the Gaseous Waste Management System Oxygen Analyzer into two separate oxygen analyzers based upon how these are operated. The Oxygen Analyzer (OAT-GW8003) is capable of continuously analyzing the oxygen concentration from the various source tanks lined up to the Waste Gas Compressor suction and any one of the Gas Decay Tanks, since the system has an inline pump that provides continuous flow. The Waste Gas Compressor Oxygen Analyzer (OAIT-GW004) is located on the discharge side of the Waste Gas Compressor and is capable of continuously analyzing the oxygen concentration in the Waste Gas Compressor discharge as long as one compressor is running. The proper operation of each analyzer is dependent upon adequate gas flow past the detector. Based upon this separation of operation, the minimum of one (1) channel being operable will need only to apply during the operation of the Waste Gas Compressor for Analyzer OAIT-GW004. Also, a change to ACTION Statement 38 is requested to cover individual operation of each analyzer for less than the stated channels operable.

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.

This change separates the Gaseous Waste Management System oxygen analyzers into two analyzers based upon their application. The OAT-GW8003 analyzer is capable of continuously analyzing oxygen concentration from the various source tanks and any one of the Gas Decay Tanks. The OAIT-GW004 analyzer requires the Waste Gas Compressor to be in operation for it to function. The proposed change clarifies the functional requirements and revises the Action Statement to reflect this change.

The changes to Table 3.3-13 made to separate the two oxygen analyzers into individual monitors, based on their separate application in the system does not impact the Accident Analysis of the Byron/Braidwood FSAR. Rather it more clearly defines the application and function of the two oxygen analyzers. As a result, the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

No physical change or modification to the Gaseous Waste Management System is being made, and its intended operation as described in the FSAR will remain unchanged. The application of the two oxygen analyzers will be more clearly defined by these changes. As such, the changes do not create the possibility of a new or different kind of accident from any previously analyzed.

Since, the Gaseous Waste Management System operation is not affected by this change, which is made to more clearly define the application of the two oxygen analyzers, this change does not affect the margin of safety.

Therefore, based on the above evaluation Commonwealth Edison believes that these changes do not involve significant hazards considerations.