

ATTACHMENT A

PROPOSED CHANGE TO APPENDIX A,  
TECHNICAL SPECIFICATIONS OF FACILITY  
OPERATING LICENSES NPF-37 and 66

Revised Page: 3/; 7-14

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(the provisions of Specification 3.0.4 are not applicable),

PLANT SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

- c. With one essential service water makeup pump inoperable, restore the essential service water makeup pump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With the essential service water pump discharge water temperature not meeting the above requirement, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. With the minimum Rock River water level not meeting the above requirement, notify the NRC within 1 hour in accordance with the procedure of 10 CFR 50.72 of actions or contingencies to ensure an adequate supply of cooling water to the Byron Station for a minimum of 30 days, verify the Rock River flow within 1 hour, and:
  - (1) If Rock River flow is less than 700 cubic feet per second (cfs) be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours, or
  - (2) If Rock River flow is equal to or greater than 700 cfs continue verification procedure every 12 hours or until Rock River water level exceeds 670.6 feet MSL or
  - (3) If Rock River level is equal to or less than 664.7 feet MSL be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours
- f. With one deep well inoperable and:
  - (1) The Rock River water level predicted, through National Weather Service flood forecasts, to exceed 702 feet MSL, or
  - (2) The Rock River water level at or below 670.6 feet MSL, or
  - (3) A tornado watch issued by the NWS that includes the area for the Byron Station.

Notify the NRC within 1 hour in accordance with the procedure of 10 CFR 50.72 of actions or contingencies to ensure an adequate supply of cooling water to the Byron Station for a minimum of 30 days and restore both wells to OPERABLE status before the Rock River water level exceeds 702 feet MSL or the minimum Rock River level or flow falls below 664.7 feet MSL or 700 cfs, respectively, or within 72 hours, whichever occurs first, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.5 The UHS shall be determined OPERABLE at least once per:

- a. 24 hours by verifying the water level in each UHS cooling tower basin to be greater than or equal to 873.5 feet MSL. (50%),

## ATTACHMENT E

### Background Information

The Rock River is one of two makeup sources for the ultimate heat sink at Byron Station. Byron Units 1 and 2 are presently operating in Mode 1. The ongoing drought in the mid-western part of the nation has caused the level in the Rock River to drop below the limit specified in the limiting condition for operation of the ultimate heat sink technical specification. That limit is 670.6 feet mean sea level (MSL). As a result, Byron Station has entered technical specification action requirement 3.7.5.e. This action requirement permits reactor operation to continue for an unlimited period of time as long as river flow remains greater than 700 cubic feet per second (cfs) and river level remains above 664.7 feet MSL. River flow must be verified every 12 hours under these conditions until the level exceeds 670.6 feet MSL.

General technical specification 3.0.4 applies to technical specification 3.7.5. According to specification 3.0.4, entry into an operational mode or other specified condition cannot be made unless the conditions of the limiting condition for operation are met without reliance on provisions contained in the action requirements. As a result, if Byron Unit 1 or 2 shut down, the unit cannot be restarted because the limiting condition for operation would not be satisfied without reliance on an action requirement even though the action requirement would permit continued operation. In other words, a shut down unit would be prevented from startup until the Rock River level exceeded 670.6 feet MSL.

The proposed technical specification change would revise action requirement 3.7.5.e.(2) to state that the provisions of specification 3.0.4 do not apply. This change is in accordance with a problem identified in NRC Generic Letter 87-09. The problem noted in the generic letter is that exceptions to specification 3.0.4 have not been consistently applied to individual technical specifications. The generic letter points out that, generally, individual technical specifications that have action requirements which allow continued operation contain a specific exception that specification 3.0.4 does not apply.

Action requirement 3.7.5.e.(2) permits continued operation and maintains an acceptable level of safety. The 670.6 feet MSL limit is essentially an alarm setpoint that requires station personnel to verify the Rock River flow every 12 hours. The minimum flow (700 cfs) and level (664.7 feet MSL) limits that assure adequate suction for the essential service water makeup pumps are not being changed. Therefore, this action requirement should contain an exception to specification 3.0.4 that is consistent with Generic Letter 87-09.

The proposed Technical Specification change will allow continued operation or a startup to occur with the required flow being verified. This ensures an acceptable level of safety for unlimited continued operation while eliminating an unnecessary restriction on unit startups.

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the 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.

The Rock River is one of two makeup sources for the ultimate heat sink at Byron Station. This proposed amendment revises a technical specification action requirement concerning Rock River water level and flow. The action requirement is being revised to state that the provisions of technical specification 3.0.4 are not applicable. This will have the effect of permitting changes in operational modes while relying on the action requirement.

Water level and flow in the Rock River have no effect on the probability of previously evaluated accidents. Therefore, the probability of previously evaluated accidents will not be increased.

The affected action requirement permits reactor operation to continue as long as river flow and level stay above minimum requirements. The minimum flow and level limits that assure adequate suction for the essential service water makeup pumps are not being changed by this amendment. As a result, the consequences of previously evaluated accidents will not be increased.

This proposed amendment does not allow any new mode of operation beyond what is already permitted by the action requirement. In addition, this amendment does not allow any modification to the plant. Therefore, operation of the facility in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Since the technical specification minimum flow and level limits for the Rock River are not being changed, this amendment does not involve a significant reduction in a margin of safety.

For the reasons stated above, Commonwealth Edison believes this proposed amendment involves no significant hazards consideration.