

POWER DISTRIBUTION LIMITS

SURVEILLANCE REQUIREMENTS (Continued)

- 2) When the F_{xy}^C is less than or equal to the F_{xy}^{RTP} limit for the appropriate measured core plane, additional power distribution maps shall be taken and F_{xy}^C compared to F_{xy}^{RTP} and F_{xy}^L at least once per 31 EFPD.
- e. The F_{xy} limits for RATED THERMAL POWER (F_{xy}^{RTP}) shall be ~~1.75~~^{provided} for all core planes containing Bank "D" control rods and ~~1.55 for~~ all unrodded core planes in a Radial Peaking Factor Limit Report per Specification 6.9.1.9;
- f. The F_{xy} limits of Specification 4.2.2.2e., above, are not applicable in the following core plane regions as measured in percent of core height from the bottom of the fuel:
- 1) Lower core region from 0 to 15%, inclusive,
 - 2) Upper core region from 85 to 100%, inclusive,
 - 3) Within $\pm 2\%$ of grid plane regions such that no more than 20% of the total core height in the center core region is affected, and
 - 4) Core plane regions within $\pm 2\%$ of core height (± 2.88 inches) about the bank demand position of the Bank "D" control rods.
- g. With F_{xy}^C exceeding F_{xy}^L , the effects of F_{xy} on $F_Q(Z)$ shall be evaluated to determine if $F_Q(Z)$ is within its limits.

4.2.2.3 When $F_Q(Z)$ is measured for other than F_{xy} determinations, an overall measured $F_Q(Z)$ shall be obtained from a power distribution map and increased by 3% to account for manufacturing tolerances and further increased by 5% to account for measurement uncertainty.

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ADMINISTRATIVE CONTROLS

REPORTING REQUIREMENTS (Continued)

"Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof. For solid wastes, the format for Table 3 in Appendix B shall be supplemented with three additional categories: class of solid wastes (as defined by 10 CFR Part 61), type of container (e.g., LSA, Type A, Type B, Large Quantity), and SOLIDIFICATION agent or absorbent (e.g., cement, urea formaldehyde).

The Semiannual Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Semiannual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PCP, pursuant to Specifications 6.13, as well as any major changes to Liquid, Gaseous or Solid Radwaste Treatment Systems, pursuant to Specification 6.15.

The Semiannual Radioactive Effluent Release Reports shall also include the following: an explanation as to why the inoperability of liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified in Specifications 3.3.3.1⁹ or 3.3.3.1¹⁰, respectively; and description of the events leading to liquid (holdup tanks) or gas storage tanks exceeding the limits of Specification 3.11.1.4 or 3.11.2.6, respectively.

MONTHLY OPERATING REPORT

6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or RCS safety valves, shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the NRC Regional Office, no later than the 15th of each month following the calendar month covered by the report.

RADIAL PEAKING FACTOR LIMIT REPORT

6.9.1.9 ~~Changes to~~ The F_{xy} limits for Rated Thermal Power (F_{xy}^{RTP}) shall be provided to the NRC Regional Administrator with a copy to Director of Nuclear Reactor Regulation, Attention: Chief, ~~Core Performance Branch~~, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555 for all core planes containing Bank "D" control rods and all unrodded core planes and the plot of predicted ($F_q^T \cdot P_{Rel}$) vs Axial Core Height with the limit envelope at least 60 days prior to cycle initial criticality unless otherwise approved by the Commission by letter. In addition, in the event that the limit should change requiring a new

Reactor Systems Branch, DPL-A

POWER DISTRIBUTION LIMITS

SURVEILLANCE REQUIREMENTS (Continued)

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- e. The F_{xy} limits for RATED THERMAL POWER (F_{xy}^{RTP}) shall be ~~1.71~~^{provided} for all core planes containing Bank "D" control rods and ~~1.55~~ for all unrodded core planes *in a Radial Peaking Factor Limit Report per Specification 6.9.1.9;*
- f. The F_{xy} limits of Specification 4.2.2.2e., above, are not applicable in the following core planes regions as measured in percent of core height from the bottom of the fuel:
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- g. With F_{xy}^C exceeding F_{xy}^L , the effects of F_{xy} on $F_Q(Z)$ shall be evaluated to determine if $F_Q(Z)$ is within its limits.

4.2.2.3 When $F_Q(Z)$ is measured for other than F_{xy} determinations, an overall measured $F_Q(Z)$ shall be obtained from a power distribution map and increased by 3% to account for manufacturing tolerances and further increased by 5% to account for measurement uncertainty.

ADMINISTRATIVE CONTROLS

REPORTING REQUIREMENTS (Continued)

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The Semiannual Radioactive Effluent Release Reports shall also include the following: an explanation as to why the inoperability of liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified in Specifications 3.3.3.10 or 3.3.3.11, respectively; and description of the events leading to liquid holdup tanks or gas storage tanks exceeding the limits of Specification 3.11.1.4 or 3.11.2.6, respectively.

MONTHLY OPERATING REPORT

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ATTACHMENT B

BACKGROUND INFORMATION

The proposed amendment requests the deletion of the fixed F_{xy} limits from Specification 4.2.2.2.e and requires the cycle specific F_{xy} limits be submitted to the NRC in a Radial Peaking Factor Limit Report. It was previously felt that variable F_{xy} limits would not be required for each cycle and the fixed limits would eliminate the need to report F_{xy} limits to the NRC on a reload basis. It has been found that the F_{xy} values for subsequent cycles are higher than first cycle values.

The current specification wording does not allow Byron and Braidwood Stations to use existing F_q margin when calculating the F_{xy} limits. This can result in entering the F_q Technical Specification action statement for artificially low F_{xy} limits. In addition, the specification currently limits the stations to F_{xy} values for only two core regions; one for core planes containing Bank "D" control rods and one for the unrodded core planes. It may be advantageous to establish more than two F_{xy} limits depending on the margin to the F_q limit as a function of height using actual calculated F_{xy} values.

The current specification does not allow the flexibility of sending a Radial Peaking Factor Limit Report to the NRC to revise the F_{xy} limits. Even if the Report was issued per Specification 6.9.1.9 with new F_{xy} limits, the limits would be inconsistent with the fixed limits in Specification 4.2.2.2. To avoid the need for a Technical Specification amendment for each revision to the limits in Specification 4.2.2.2.e, Commonwealth Edison requests this proposed amendment to the Technical Specifications. This change is consistent with the Standardized Technical Specifications and the Technical Specifications for other plants such as Callaway, Wolf Creek, Catawba, and Seabrook.

Two other changes are also requested for this amendment. In Specification 6.9.1.9, "Chief, Core Performance Branch" should be revised to "Chief, Reactor Systems Branch, DPL-A" to reflect the current title. In addition, Specification 6.9.1.7, references Specifications 3.3.3.10 and 3.3.3.11, this should be revised to reference, Specifications 3.3.3.9 and 3.3.3.10. This revision is to correct these typographical errors.

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARD CONSIDERATIONS

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 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.

The proposed Technical Specification amendment requests several changes. The first change removes the existing, fixed F_{xy} limits in Specification 4.2.2.2.e and substitutes a requirement to submit the F_{xy} limits to the NRC via a Peaking Factor Limit Report in accordance with Specification 6.9.1.9. The second change revises the position title to whom the Radial Peaking Factor Limit Report is submitted per Specification 6.9.1.9. The title is changed from "Chief, Core Performance Branch" to "Chief, Reactor Systems Branch, DPL-A" which is consistent with the title listed in Braidwood's Technical Specifications. Finally in Specification 6.9.1.7, the references to Specifications "3.3.3.10 and 3.3.3.11" are being changed to Specifications "3.3.3.9 and 3.3.3.10" respectively because an incorrect Specification is referenced.

All the changes requested are administrative in nature and do not affect the probability of an accident occurring. The proposed revision to Specification 4.2.2.2.e does not change the current F_{xy} limits used at the plant. It simply revises the method by which changes to the F_{xy} limits can be requested and implemented. The other changes correct a typographical error and change a position title. None of these changes affect the assumptions or results of any accidents previously analyzed. Therefore the consequences of any accidents are not impacted.

The proposed changes do not involve any equipment additions or modifications at the plant or cause the plant to be operated in a different manner. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

The Radial Peaking Factor, $F_{xy}(Z)$ is measured periodically to provide assurance that the Heat Flux Hot Channel Factor $F_q(Z)$ remains within its limit. The limits on Heat Flux Hot Channel Factor help to ensure the design limits on peak local power density and minimum DNBR are not exceeded and in the event of a LOCA, the peak fuel clad temperature will not exceed the 2200°F acceptance criteria. The proposed change to remove the fixed F_{xy} limits from the Technical Specification and replace the requirement with a submittal of a Radial Peaking Factor Limit Report does not change the F_{xy} limits. The remaining changes are administrative in nature. The changes proposed for this amendment do not affect any margins of safety.

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

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