

September 11, 1998

Mr. Oliver D. Kingsley, President  
Nuclear Generation Group  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - BYRON STATION, UNITS 1  
AND 2, AND BRAIDWOOD STATION, UNITS 1 AND 2 (TAC NOS. M97548,  
M97549, M97546 AND M97547)

Dear Mr. Kingsley:

On December 13, 1996, Commonwealth Edison Company (ComEd) proposed to amend the technical specifications (TS) for Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2, to be consistent with the improved TS in NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1. During the course of our review, we have identified the need for further information as discussed in the enclosed request for additional information (RAI). This request seeks to clarify Sections 3.3.1 and 3.3.3 - 3.3.8.

To support the NRC staff's review schedule, your written and electronic response to this RAI is requested within 30 days of the date of this letter. Should you have any questions, please contact me at (301) 415-1391.

Sincerely,

ORIG. SIGNED BY S. BAILEY  
for  
Ramin R. Assa, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

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PDR ADOCK 05000454  
P PDR

Docket Nos. STN 50-454, STN 50-455,  
STN 50-456, STN 50-457

Enclosure: RAI

cc w/encl: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 11, 1998

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Sincerely,

A handwritten signature in black ink, appearing to read "Ramin R. Assa", is written over a horizontal line.

/s/ Ramin R. Assa, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455,  
STN 50-456, STN 50-457

Enclosure: RAI

cc w/encl: See next page

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Commonwealth Edison Company

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O. Kingsley  
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- 2 -

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**Byron & Braidwood Improved TS Review Comments  
ITS 3.3.1, Reactor Protection System Instrumentation**

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**3.3.1-01**      DOC L.26  
                 CTS Table 3.3-1 Action 2.b  
                 ITS LCO 3.3.1 Condition E

Discussion of Change L.26 states in one sentence that "The equivalent ITS Action ..... does not require these steps" whereas in the next sentence states that "these actions are necessary." This particular CTS Action is not included in the ITS as stated in the first part of the CTS DOC L.26. For the most part this change is justified. **Comment:** Review and revise DOC L.26 to eliminate conflicting statements.

**ComEd Response:**

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**3.3.1-02**      CTS Table 2.2.1 Functional Unit 19.a  
                 ITS Table 3.3.1-1 Function 17.a  
                 STS Table 3.3.1-1 Function 18.a  
                 ITS Table 3.3.1-1 Note c.  
                 STS Table 3.3.1-1 Note d.  
                 ITS Table 3.3.1-1 Note d.  
                 STS Table 3.3.1-1 Note e.

The CTS references the term "Intermediate Range Neutron Flux, P-6" in the Tables and in associated Notes. The corresponding P-6 in the ITS has been changed to "Source Range Block Permissive" without supporting DOC. **Comments:** Provide specific DOC for the change in terminology from Intermediate Range Neutron Flux P-6 to Source Range Block Permissive P-6.

**ComEd Response:**

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**3.3.1-03**      CTS Table 2.2.1 Functional Unit 19.b 1) and 2) "Allowable Value"  
                 ITS Table 3.3.1-1 Function 17.a  
                 STS Table 3.3.1-1 Function 18.a

CTS Table 2.2-1 Functional Unit 19.a Items 1) and 2) Allowable Values is not retained in the ITS. There is no DOC to support the deletion of these items. **Comment:** Revise submittal to either include these Allowable Values in the ITS or provide DOC to support the deletion.

**ComEd Response:**

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**Byron & Braidwood Improved TS Review Comments**  
**ITS 3.3.1, Reactor Protection System Instrumentation**

**3.3.1-04**      CTS Table 2.2.1 Note 1  
                 ITS Table 3.3.1-1 Note 1  
                 STS Table 3.3.1-1 Note 1

Item P' in the CTS Table 2.2.1 Note 1 is defined by using the "=" sign. The same item in the ITS Table 3.3.1-1 Note 1 is defined by using the ">" with no supporting DOC. **Comment:** Revise submittal to either include the "=" in the ITS or provide DOC to support the change.

**ComEd Response:**

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**3.3.1-05**      CTS Table 4.3-1 Functional Unit 17 and 18  
                 ITS Table 3.3.1-1 Function 11 and 16  
                 CTS Table 4.3-1 Note 10  
                 ITS SR 3.3.1.13 Note  
                 STS SR 3.3.1.14 Note

The Note in the ITS SR 3.3.1.13 which states that "Verification of setpoint is not required" is not used in the CTS SR. CTS Table 4.3-1 Functional Unit 17 and 18 does not reference CTS Table 4.3-1 Note 10 which in other cases would provide exception to the verification of setpoints. There is no DOC to support this less restrictive change. **Comment:** Revise submittal to provide DOC to support this less restrictive change.

**ComEd Response:**

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**3.3.1-06**      DOC A.11  
                 CTS SR 4.3.1.2  
                 ITS Table 3.3.1-1 Function 2.a, 2.b, 3.b, 5, 6, 7, 8.a, 8.b, 10, 12, 13, and 14  
                 ITS SR 3.3.1.15 Note  
                 STS SR 3.3.1.16 Note

The Note in the ITS SR 3.3.1.15 which states that "Neutron detectors are excluded from response time testing" is not used in the CTS SR 4.3.1.2. DOC A.11, CTS Table 4.3-1 Functional Units or CTS Table 4.3-1 Table Notations do not provide exceptions to Neutron detection response time testing. There is no DOC to support this less restrictive change. **Comment:** Revise submittal to provide DOC to support this less restrictive change.

**ComEd Response:**

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**Byron & Braidwood Improved TS Review Comments  
ITS 3.3.1, Reactor Protection System Instrumentation**

3.3.1-07      JFD C.7  
                 ITS BASES SR 3.3.1.15 Insert B 3.3-59A  
                 ITS BASES SR 3.3.2.11 Insert B 3.3-119A  
                 STS BASES SR 3.3.1.16  
                 STS BASES SR 3.3.2.10

The ITS BASES for SR 3.3.1.15 and SR 3.3.2.11 have adopted TSTF-111. At this time, TSTF-111 has not been approved by the NRC and, in addition, Insert B 3.3-59A and Insert B 3.3-119A for the ITS does not contain the latest information discussions/revisions. These latest revisions relating to TSTF-111 are addressed in a memo from Dr. W. Beckner (NRC) to Mr. Davis (NEI) dated 17 August 1998. **Comment:** Revise submittal to either use the STS without TSTF-111 or adopt TSTF-111 (with the latest revisions) with the assumption that it (TSTF-111) will be adopted by the industry prior to issuance of COMED's TS amendment SE.

**ComEd Response:**

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**Byron & Braidwood Improved TS Review Comments**  
**ITS 3.3.3 to 3.3.9**

**3.3.3-01 JFD P26**

ITS 3.3.3, PAM Instrumentation

ITS Table 3.3.3-1

The proposed ITS 3.3.3 PAM TS needs to be revised. Specifically, the following areas need to be modified:

- 1) The proposed Condition A is not general enough to encompass all of the conditions in Table 3.3.3-1. Suggest that Condition A be revised, similar to Condition A in TS 3.3.1 and TS 3.3.2, to read: "One or more functions with one or more required channels inoperable."
- 2) Proposed Condition B should read as proposed Condition A currently reads.
- 3) The Note to Condition E, declaring it not applicable to Function 15, is incorrectly discussed in the Bases as being a Note to Condition D.

**Comment:** Revise the submittal.

**ComEd Response:**

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**3.3.4-01 JFD P29 and DOC LA23**

STS Table 3.3.4-1 and ITS Bases Table B 3.3.4-1

CTS Table 3.3-9

Information in CTS Table 3.3-9 and STS Table 3.3.4-1, listing "Required Number of Channels," similar to information that is retained in other ITS 3.3 sections, has been moved to ITS Bases Table B 3.3.4-1. **Comment:** Since this information/table is in the CTS and the STS, and similar information has been retained in tables in other ITS 3.3 sections, retain Table 3.3.4-1 in the ITS.

**ComEd Response:**

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**3.3.4-02 JFD P30**

STS SR 3.3.4.2 and STS SR 3.3.4.4

The STS includes SR 3.3.4.2 and SR 3.3.4.4 to confirm the operability of the Remote Shutdown System, not merely its instrumentation, as P30 indicates the CTS does. The ITS does not include these SRs. **Comment:** Include STS SR 3.3.4.2 and STS SR 3.3.4.4 in the ITS to adequately confirm the operability of the Remote Shutdown System.

**ComEd Response:**

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**Byron & Braidwood Improved TS Review Comments**  
**ITS 3.3.3 to 3.3.9**

**3.3.5-01 JFD P54**  
ITS 3.3.5, Editorial Change

The word "if" has been added to Required Action C.1, "to be consistent with changes in section 3.7." **Comment:** The addition of "if" does not add clarity, and might add confusion. Suggest deleting the word "if" from sections 3.3.5 and 3.7, for clarity and consistency.

**ComEd Response:**

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**3.3.6-01 JFD C4 and DOC L18**  
STS 3.3.6 Applicability  
ITS Table 3.3.6-1

In the STS the applicability is explicitly stated in the Applicability section of the TS, while in the ITS the applicability is referred to on Table 3.3.6-1. **Comment:** The ITS applicability is incorrect on Table 3.3.6-1, in that it does not have footnotes to include the conditions "During CORE ALTERATIONS," and "During movement of irradiated fuel assemblies within containment." Correct the applicability on ITS Table 3.3.6-1.

**ComEd Response:**

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**3.3.6-02 JFD P34**  
STS 3.3.6 Condition B  
ITS 3.3.6 Condition B

The ITS deletes the STS reference to manual functions in ITS 3.3.6 Condition B. **Comment:** Why? Can't the system be manually actuated? Include if appropriate.

**ComEd Response:**

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**3.3.6-03 JFD P34**  
STS SR 3.3.6.6  
CTS Table 4.3.2

The CTS includes TADOT surveillances of Manual Initiation capabilities of Containment Ventilation Isolation in CTS Table 4.3.2. The STS includes this surveillance as SR 3.3.6.6. The ITS deletes this SR. **Comment:** Why? Include STS SR 3.3.6.6 in the ITS.

**ComEd Response:**

Byron & Braidwood Improved TS Review Comments  
ITS 3.3.3 to 3.3.9

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**3.3.6-04** DOC L12  
ITS 3.3.6  
CTS Table 3.3-6

DOC L12 explains that the CTS requires immediate closure of containment purge valves whenever a radiation monitoring channel is inoperable, while the ITS allows 8 hours to place the valves in the closed position. **Comment:** It appears to this reviewer that the ITS (and STS) allow 4 hours to close the containment purge valves, not 8 hours. Explain how 8 hours is allowed. Correct DOC L12 if appropriate.

**ComEd Response:**

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**3.3.7-01** JFD C4  
STS 3.3.7 Applicability  
ITS Table 3.3.7-1

In the STS the applicability is explicitly stated in the Applicability section of the TS, while in the ITS the applicability is referred to on Table 3.3.7-1. **Comment:** The ITS applicability is incorrect on Table 3.3.7-1, in that it does not have a footnote to include the condition "During CORE ALTERATIONS" on ITS Table 3.3.7-1.

**ComEd Response:**

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**3.3.7-02** JFD P38  
STS SR 3.3.7.3, STS SR 3.3.7.4, STS SR 3.3.7.5, and , STS SR 3.3.7.6

STS SR 3.3.7.3, STS SR 3.3.7.4, STS SR 3.3.7.5, and , STS SR 3.3.7.6 have not been included in the 'S based on their absence in the CTS (to reflect plant specific functions ...).

**Comment:** Explain why the deleted STS surveillances do not confirm the operability of the VC Filtration System Actuation Instrumentation. Include surveillances as appropriate.

**ComEd Response:**

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**3.3.8-01** JFD P40  
ITS 3.3.8 Required Action B.1

ITS 3.3.8 Required Action B.1 states to "Place in emergency mode one FHB Ventilation System Train capable of being powered by an OPERABLE emergency power source."

**Byron & Braidwood Improved TS Review Comments**  
**ITS 3.3.3 to 3.3.9**

**Comment:** Explain why the phrase "capable of being powered by an OPERABLE emergency power source" is necessary for this required action. The status of support systems is not generally stipulated in action statements.

**ComEd Response:**

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**3.3.8-02 JFD P40**

STS 3.3.8 SR 3.3.8.3 and STS 3.3.8 SR 3.3.8.4

STS 3.3.8 SR 3.3.8.3 and STS 3.3.8 SR 3.3.8.4 have not been included in the ITS based on their absence in the CTS (to reflect plant specific functions ...).

**Comment:** Explain why the deleted STS surveillances do not confirm the operability of the FBACS Actuation Instrumentation. Include surveillances as appropriate.

**ComEd Response:**

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