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ComEd

October 5, 1998

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D.C. 20555 - 0001

Subject: Commonwealth Edison's (ComEd's) Response to the NRC's Request for Additional Information (RAI) for Improved Technical Specifications (ITS) Section 3.3.2

Byron Nuclear Power Station, Units 1 and 2
Facility Operating Licenses NPF-37 and NPF-66
NRC Docket Numbers: 50-454 and 50-455

Braidwood Nuclear Power Station, Units 1 and 2
Facility Operating Licenses NPF-72 and NPF-77
NRC Docket Numbers: 50-456 and 50-457

References: G. Stanley and K. Graesser (ComEd) letter to USNRC, "Conversion to the Improved Standard Technical Specifications," dated December 13, 1996

The purpose of this letter is to transmit ComEd's Response to the NRC's RAI for ITS Section 3.3.2. The responses to the RAI questions are contained in the Attachment, Response to NRC RAI for ITS Section 3.3.2.

The RAI contains questions and comments stemming from the NRC's partial review of a ComEd request (Reference 1) to amend the Current Technical Specifications (CTS) for Byron Units 1 and 2 and Braidwood Units 1 and 2. The amendments were requested in order to adopt the Improved Technical Specifications of NUREG-1431, Revision 1.

A001

130037

As discussed with NRC Staff in an August 12, 1997 teleconference, this submittal does not include any replacement or CTS Markup pages. The required page changes and markups will be submitted at a later date when the NRC review and acceptance of ComEd's Response to this NRC RAI is complete.

Please address any comments or questions regarding this matter to our Nuclear Licensing Department.

Sincerely,

Timothy J. Tulon
Site Vice President
Braidwood Nuclear Generating Station

Attachment: Response to NRC RAI for ITS Section 3.3.2

cc: Regional Administrator - RIII
Senior Resident Inspector - Braidwood
Senior Resident Inspector - Byron
Office of Nuclear Facility Safety – IDNS

nrc/98062tjt.doc

Attachment

Byron / Braidwood
Response to NRC RAI for ITS Section 3.3.2
(Improved Technical Specification Submittal)

Response to NRC RAI Dated 09/22/98

NRC RAI Number	NRC Issued Date	RAI Status
3.3.2-01	9/22/98	Open - ComEd Action Required

NRC Description of Issue

3.3.2-01
CTS Table 3.3-3 Notation #
CTS Table 3.3-1 Functional Unit 1.d and 1.e
ITS Table 3.3.2-1 Footnote a
ITS Table 3.3.2-1 Function 1.d and 1.e

CTS Table 3.3-3 Notation # differs from ITS Table 3.3.2-1 Footnote a with no discussion of change. Comment: Revise submittal to either include this note in the ITS or provide DOC to support the difference.

ComEd Response to Issue

An 'A' DOC has been written and states, "In CTS Table 3.3-3, Functional Unit 1.d for "Pressurizer Pressure-Low (Above P-11)" and Functional Units 1.e and 4.d for "Steam Line Pressure-Low (Above P-11)" have an Applicability of Modes 1, 2, and 3# where footnote (#) states that the trip function may be blocked in Mode 3 below the P-11 setpoint. Functional Unit 4.d for "Steam Line Pressure Negative Rate - High (below P-11)" has an Applicability of Mode 3## where footnote (##) states that the trip function is automatically blocked above P-11 and may be blocked below P-11 when the steam line pressure-low SI is not blocked. In ITS Table 3.3.2-1, Function 1.d for "Pressurizer Pressure - Low" and Function 1.e for "Steam Line Pressure - Low" have an Applicability of Modes 1, 2, and 3(a) where footnote (a) states above the P-11 interlock. Function 4.d.1 for "Steam Line Pressure - Low" has an Applicability of Modes 1, 2(h), and 3(a)(h)(f) where footnote (a) states above the P-11 interlock, footnote (h) states except when all MSIVs and MSIV bypass valves are closed, and footnote (f) states below the P-11 interlock with Function 4.d.2 not enabled. Function 4.d.2 for "Steam Line Pressure Negative Rate - High" has an Applicability of Mode 3(h)(d) where footnote (d) states below the P-11 interlock with Function 4.d.1 blocked. This change is necessary due to the reformatting of the requirements contained in the ITS. This change is perceived as the intent of the CTS wording, is considered editorial in nature and does not involve a technical change (either actual or interpretational) to the TS unless otherwise noted." This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

Response to NRC RAI Dated 09/22/98

NRC RAI Number	NRC Issued Date	RAI Status
3.3.2-02	9/22/98	Open - ComEd Action Required

NRC Description of Issue

3.3.2-02
DOC A.22
CTS Table 3.3-4 Functional Unit 6.f

DOC A.22 does not describe or discuss the actual change to CTS Table 3.3-4 Functional Unit 6.f. It references a ComEd letter with no supporting information. Comments: Provide more specific DOC for A.22 in reference to the change to CTS Table 3.3-4 Functional Unit 6.f.

ComEd Response to Issue

CTS DOC 3.3-A22 was revised to state, "By letter dated December 30, 1997, ComEd requested a change to CTS Table 3.3-4 Functional Unit 6.g, Auxiliary Feedwater Pump Suction Pressure - Low, Trip Setpoint and Allowable Value (and LCO 3.7.1.3 to raise the CST level, which is addressed in another ITS Section). The clouded portions of the CTS markup reflect this request which is scheduled to be issued to ComEd by October 15, 1998. This change was requested as a result of ComEd identifying an operability concern involving the postulated failure of Safety Category II CST piping in the turbine building during a seismic event. This postulated failure of the non-seismic piping could eventually result in atmospheric pressure (14.7 psia) in the AF suction line. This would minimize the potential for an automatic switch over of the AF water supply from the CST to SX water, since the previous Trip Setpoint value was 14.1 psia (1.22" Hg vac). In response to the operability concern, the minimum administrative CST level and the physical height of the CTS were raised. Additionally, ComEd submitted the above mentioned CTS License Amendment Request to increase the AF pump Suction Pressure - Low Trip Setpoint and Allowable Value to greater than or equal to 18.1 psia and 17.4 psia, respectively, as well as to increase the minimum required CST level. These setpoints ensure that the automatic switch over of the AF supply would occur when required." This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

Response to NRC RAI Dated 09/22/98

NRC RAI Number	NRC Issued Date	RAI Status
3.3.2-03	9/22/98	Open - ComEd Action Required

NRC Description of Issue

DOC A.17
CTS Table 4.3-2 Insert 3.3-37A
ITS SR 3.3.2.9 Note
STS SR 3.3.2.8
JFD P.53

The ITS SR 3.3.2.9 Note has deleted the term "... for manual initiation functions" in which JFD P.53 explains. The CTS Table 4.3-2 Insert 3.3-37A has inserted the note which includes the term "... for manual initiation functions" in which DOC A.17 also explains. The edits as well as the associated JFD and DOC conflict with each other. Comment: Revise submittal to either include or not include this note and make the JFS and DOC consistent with each other.

ComEd Response to Issue

CTS INSERT 3.3-37A for the SR 3.3.2.9 Note has been revised to be consistent with ITS SR 3.3.2.9, LCO JFD 3.3-P53, and CTS DOC 3.3-A17 and states, "Verification of setpoint not required." This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.