

ATTACHMENT A

PROPOSED CHANGE TO APPENDIX A  
TECHNICAL SPECIFICATIONS OF  
FACILITY OPERATING LICENSE NPF-37

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EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 1) For all accessible areas of the containment prior to establishing CONTAINMENT INTEGRITY, and
  - 2) Of the areas affected within containment at the completion of each containment entry when CONTAINMENT INTEGRITY is established.
- d. At least once per 18 months by:
- 1) Verifying automatic isolation and interlock action of the RHR System from the Reactor Coolant System by ensuring that:
    - a) With a simulated or actual Reactor Coolant System pressure signal greater than or equal to 360 psig the interlocks prevent the valves from being opened, and
    - b) With a simulated or actual Reactor Coolant System pressure signal greater than or equal to 662 psig the interlocks will cause the valves to automatically close.
  - 2) A visual inspection of the containment sump and verifying that the subsystem suction inlets are not restricted by debris and that the sump components (trash racks, screens, etc.) show no evidence of structural distress or abnormal corrosion.
- e. At least once per 18 months, during shutdown, by:
- 1) Verifying that each automatic valve in the flow path actuates to its correct position on a Safety Injection test signal and on a RWST Level-Low-Low test signal, and
  - 2) Verifying that each of the following pumps start automatically upon receipt of a Safety Injection actuation test signal:
    - a) Centrifugal charging pump,
    - b) Safety Injection pump, and
    - c) RHR pump.
- f. By verifying that each of the following pumps develops the indicated differential pressure on recirculation flow when tested pursuant to Specification 4.0.5:
- 1) Centrifugal charging pump  $\geq 2396$  psid,
  - 2) Safety Injection pump  $\geq 1412$  psid, and
  - 3) RHR pump  ~~$\geq 181$  psid.~~  
Per the RHR pump Minimum  
Acceptable Performance Curve

## ATTACHMENT B

### REASONS FOR PROPOSED CHANGE

Technical Specification 4.5.2<sup>f</sup> requires the performance of each residual heat removal (RHR) pump to be periodically tested by verifying the pump develops a specified differential pressure on recirculation flow. The specified differential pressure corresponds to a flow rate of 500 gpm on the minimum acceptable performance curve. When operating an RHR pump on recirculation flow during this surveillance, flow rates in excess of 650 gpm have been observed. These higher flow rates correspond to a lower differential pressure. The proposed change, which would allow use of the minimum acceptable performance curve instead of a point on the curve, will provide more flexibility in demonstrating the required performance of the RHR pumps.

The RHR pump minimum acceptable performance curve will be included in the Byron Station surveillance that verifies the RHR pumps develop the required differential pressure. The minimum acceptable performance curve is the upper curve shown on FSAR figure 6.3-3.

## ATTACHMENT C

### SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of Byron Station Unit 1 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed change involves the use of a pump performance curve instead of a point on the curve to determine acceptable performance of a RHR pump. Therefore, the probability of accidents previously evaluated remains unchanged. The curve which would be referenced in the Technical Specification is a test curve which exceeds the curve used in previous evaluations of accidents. Therefore, the consequences of accidents previously evaluated would not change.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change only provides more flexibility in the acceptance criteria of a surveillance used to check the performance of pumps.
- 3) Involve a significant reduction in a margin of safety because the proposed change maintains the same margin between points on the test curve and the curve used for ECCS analysis.

Based on the preceding assessment, it is concluded that the proposed amendment meets the standards provided in 10 CFR 50.92 and therefore, does not involve a significant hazards consideration.