## ATTACHMENT A

PROPOSED CHANGE TO APPENDIX A

TECHNICAL SPECIFICATIONS OF

FACILITY OPERATING LICENSE NPF-37

Revised Page: 3/4 3-45

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# TABLE 3.3-7

# SEISMIC MONITORING INSTRUMENTATION

INS	TRUMENTS AND SENSOR LOCATIONS	MEASUREMENT RANGE	MINIMUM INSTRUMENTS OPERABLE
1.	Time - History Accelerographs		
	a. Aux. Elect. Rm, OPAO2J b. Byron River Screen House	N.A. N.A.	1
2.	Triaxial Peak Accelerographs		
	a. Cont./Reactor Eq. Accumulators b. Cont./Reactor piping c. Aux. Bldg./Cat. I piping	-2 g to +2 g -2 g to +2 g -2 g to +2 g	1 1 1
3.	Response-Spectrum Analyzer		
	Aux Elect Rm, OPAO2J	None	1
4.	Triaxial Acceleration Sensors		
	a. Cont./10W - 377' b. Cont/10W - 502' c. Cont./10X - 426' d. Free Field/41 + 00E, 27 + 00N e. Aux. Bldg./18N - 426' f. Byron River Screen House	2 g to +2 g -2 g to +2 g -2 g to +2 g -2 g to +2 g -2 g to +2 g 2 g to +2 g	1 1 1 1
	replace	-1 g to +1 g -1 g to +1 g	

### ATTACHMENT B

### REASONS FOR PROPOSED CHANGE

This change is requested because the seismic instrumentation has been alarming with no indication of a seismic event. It has been determined that this problem is a result of the low alarm setpoint (0.02g) being only 1% of the full scale range (2.0g) of the sensors. If the full scale range of the sensors is reduced while maintaining the same alarm setpoint of 0.02g, a larger signal will be required to reach the same alarm setpoint.

With the proposed change of the measurement range, the seismic monitoring system will still be capable of detecting a 0.02g event as described in section 3.7.4.3 of the Byron/Braidwood FSAR. The system will still detect an operating basis earthquake (0.09g) and a safe shutdown earthquake (0.2g) as described in sections 2.5.2.6 and 2.5.2.7 of the FSAR. Also, the seismic monitoring system will still meet the requirements of ANSI N18.5 and NRC Regulatory Guide 1.12.

#### ATTACHMENT C

#### SIGNIFICANT HAZARDS CONSIDERATIONS

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. 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.

This proposed amendment revises the measurement range of instruments used to measure the acceleration of a seismic event. These instruments do not perform any protective function. With respect to the first standard, the probability of accidents previously evaluated is not affected by a change to the measurement range of these monitoring instruments. Since these instruments do not perform any protective function, the consequences of accidents previously evaluated remains the same.

The sole purpose of these instruments is to perform a monitoring function. Therefore, a revision to the range of these instruments will not create the possibility of a new or different kind of accident contemplated by the second standard.

With respect to the third standard, there is no margin of safety associated with these seismic monitoring instruments.

Based on the preceeding assessment, Commonwealth Edison believes this proposed amendment involves no significant hazards considerations.