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November 6, 1998

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

Subject: Revision R to the Improved Technical Specifications (ITS) Submittal

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

Reference: G. Stanley and K. Graesser (Commonwealth Edison) letter to NRC
Document Control Desk, "Conversion to the Improved Standard Technical
Specifications," dated December 13, 1996

The purpose of this letter is to provide Revision R to the referenced ITS submittal. ITS
Revision R (Enclosure 1) contains changes to ITS Section 3.7 based on discussions with
the Section 3.7 NRC Reviewer.

These Revisions are being provided in the same ten-section format as the initial ITS
submittal:

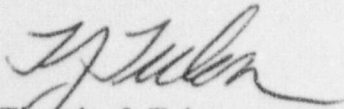
1. Byron ITS
2. Braidwood (Brwd) ITS
3. Byron CTS Markups
4. Brwd CTS Markups
5. CTS Discussion of Changes (DOCs)
6. LCO Markups
7. LCO Justification for Differences (JFDs)
8. Bases Markups
9. Bases JFDs
10. No Significant Hazards Consideration (NSHC)

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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

Enclosure 1: ITS Revision R

cc: NRC Regional Administrator - Region III
Senior Resident Inspector - Braidwood
Senior Resident Inspector - Byron
Office of Nuclear Facility Safety - IDNS

nrc/98073tjt.doc

bcc: Byron Project Manager - NRR
Braidwood Project Manager - NRR
W. Beckner - NRR
R. Assa - NRR
C. Harbuck - NRR

REVISED RAI RESPONSES

Response to NRC RAI For ITS Section 3.7

05-Nov-98

NRC RAI Number	NRC Issued Date	RAI Status
3.7.2-03	12/5/97	Closed

NRC Description of Issue

3.7.2-3 DOC M.3
JFD P.6
JFD Bases P.7
CTS 4.7.1.5
STS SR 3.7.2.1
ITS SR 3.7.2.1
ITS SR 3.7.2.2 and Associated Bases

CTS 4.7.1.5 requires the verification of full closure of each MSIV in 5 seconds when tested in accordance with CTS 4.0.5. The equivalent STS SR for this CTS requirement is STS 3.7.2.1. The ITS markup breaks STS SR 3.7.2.1 into two SRs - ITS SR 3.7.2.1 (verification of closure is 5 seconds) and ITS SR 3.7.2.2 (verification of closure by actual or simulated signal). The justification for this change (P.6) is that if the valve fails the closure time SR, there is no need to perform a full actuation test (ITS SR 3.7.2.2) since closure time can be measured without this test. This change is considered to be a generic change which is beyond the scope of review for this conversion. See Item Number 3.7.3-2. Comment: Delete this generic change.

ComEd Response to Issue

11/04/98 Revised Response: ComEd revised the ITS submittal to add the Note to SR 3.7.2.2 and the associated Bases.

10/23/98 Revised Response: TSTF-289 (WOG-98) was approved by the NRC.

Original Response: No change. ComEd disagrees that this is a beyond scope change since it does not change any technical requirements, testing procedures, or isolation times supporting the UFSAR analysis. This change is consistent with current licensing basis and the methodology currently used to test the subject valves. The CTS requires, Each MSIV shall be demonstrated OPERABLE by verifying full closure within 5 seconds when tested pursuant to Specification 4.0.5. This provided the means of testing the full closure of the MSIVs within their UFSAR required time. The CTS testing did not restrict this testing solely on using the actuated or simulated signals. Based on the Braidwood and Byron design basis, verifying that the valves fully close within the required time is adequate. STS SR 3.7.2.1 requires verifying that each MSIV actuates to the isolation position on an actual or simulated actuation signal. Although an approved method, this requirement is by no means the only test verifying that the MSIVs close within the time supporting the accident analysis. ComEd chose to divide the STS SR into two separate SRs. The reason is that if an alternate, but reliable and accepted, method is used and the valves do not meet the required stroke time, then it is unnecessary to cycle the MSIVs an additional time just for the sake of using an actual or simulated actuation signal. Both ITS SR 3.7.2.1 and 3.7.2.2 provide the same level of assurance and verification that the MSIVs are OPERABLE with regard to their closure time. ComEd continues to pursue this change. (See RAIs 3.7.3-02 and 3.7.3-03.)

Response to NRC RAI For ITS Section 3.7

05-Nov-98

NRC RAI Number	NRC Issued Date	RAI Status
3.7.2-06	12/5/97	Closed

NRC Description of Issue

3.7.2-6 STS B3.6.2 Bases - SR 3.7.2.1
ITS B3.7.2 Bases - SR 3.7.2.1

STS B3.7.2 Bases - SR 3.7.2.1 states the following in the last paragraph: "The test is conducted in MODE 3 with the unit at operating temperature and pressure as discussed in Reference 5 exercising requirements." ITS B3.7.2 Bases - SR 3.7.2.1 deletes the last part of this sentence "as discussed ... requirements." No justification is provided for this deletion.
Comment: Provide a discussion and justification for this deletion based on current licensing basis, system design, or operational constraints.

ComEd Response to Issue

11/04/98 Revised Response: ComEd conformed to NRC approved TSTF-289 by deleting "as discussed in Reference 5 exercising requirements" in the Surveillance Requirements Section of the Bases for ITS LCO 3.7.2 for SR 3.7.2.1.

Original Response: ComEd will conform to the STS. This change will be provided in our comprehensive ITS Section 3.7 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.7 RAI.

Response to NRC RAI For ITS Section 3.7

05-Nov-98

NRC RAI Number	NRC Issued Date	RAI Status
3.7.3-01	12/5/97	Closed

NRC Description of Issue

3.7.3-1 □ DOC A.5

□ □ DOC A.37

□ □ DOC A.38

□ □ DOC A.39

□ □ DOC A.41

□ □ DOC A.47

□ □ DOC M.11

□ □ DOC LA.34

□ □ DOC LA.35

□ □ DOC LA.37

□ □ DOC L.25

□ □ DOC L.26

□ □ JFD C.6

□ □ JFD P.6

□ □ JFD P.20

□ □ JFD P.27

□ □ JFD P.28

□ □ JFD Bases C.4

□ □ JFD Bases C.7

□ □ JFD Bases P.6

□ □ JFD Bases P.7

□ □ JFD Bases P.36

□ □ JFD Bases P.48

□ □ CTS 3/4.6.1.1

□ □ CTS 3/4.6.3

□ □ STS 3.7.3 and Associated Bases

□ □ ITS 3.6.3

□ □ ITS 3.7.3 and Associated Bases

CTS 3/4.6.1.1 and 3/4.6.3 contain the requirements for all feedwater valves which perform a containment isolation function. These requirements have been retained in the ITS in ITS 3.6.3 (See Item Number 3.6.3-1). The CTS does not contain a feedwater isolation valve LCO that addresses the other safety function OPERABILITY requirements. (See STS B3.7.3 Bases). It is acceptable to add ITS 3.7.3 under the guidance of NUREG-1431, based on these other safety function OPERABILITY requirements, not the containment isolation function, even though some of the ACTIONS and SRs may be the same as required by CTS 3/4.6.1.1, and 3/4.6.3, and ITS 3.6.3. In addition, this new LCO as described by justifications A.5 and M.11 have been altered by rejected generic changes - TSTF-44 (see Item Numbers 3.6.3-1, 3.7.1-2, 3.7.2-5, and 3.7.4-3) and TSTF-102 (see Item Number 3.7.2-1), as well as other changes which the staff considers to be generic. Comment: Revise the CTS /ITS markup to delete the reference to and markups of CTS 3/4.6.1.1 and 3/4.6.3 and TSTF- 44 and TSTF-102. Refer to Item Numbers 3.7.3-2, 3.7.3-3, 3.7.3-4, and 3.7.3-5 for additional comments that reflect changes to the CTS markup of justification M.11 (CTS Insert 3.6.1-A).

ComEd Response to Issue

11/04/98 Revised Response: Due to deleting the NUREG FW Isolation Valve specification, Byron and Braidwood CTS Markup pages 3/4 6-1, 3/4 6-16, 3/4 6-17, and 3/4 6-21 have been deleted from the ITS submittal.

10/23/98 Revised Response: ComEd is not adopting NUREG 3.7.3 based on Current Licensing Basis (CLB). The feedwater isolation valves will continue to be covered under ITS 3.6.3, CIVs. Since the FW Isolation Valve specification has been deleted from the Byron/Braidwood ITS submittal, ITS 3.7.17, "Secondary Specific Activity," has been moved from the end of Section 3.7 to the position of ITS 3.7.3. The RAI associated with the Secondary Specific Activity specification continues to be numbered as 3.7.17-01, although the specification number has changed. This change is provided in our comprehensive ITS Section 3.7 closeout submittal Revision N.

Original Response: Consistent with the ComEd Response to RAI 3.6.3-01, TSTF-44 will be withdrawn from the ITS

Response to NRC RAI For ITS Section 3.7

05-Nov-98

NRC RAI Number	NRC Issued Date	RAI Status
3.7.7-02	12/5/97	Closed

NRC Description of Issue

3.7.7-2 DOC A.40

□□JFD P.17

□□JFD Bases P.15

□□CTS 4.7.3.3.b

□□ITS SR 3.7.7.2 and Associated Bases

CTS 4.7.3.3.b requires verifying that the Essential Service Water (SX) system is available to each CC Heat Exchanger. The ITS adds this requirement at ITS SR 3.7.7.2 and modifies it to verify correct SX system valve position. ITS B3.7.7 Bases - SR 3.7.7.2 states that the SR verifies that the valves are in the correct position or can be aligned to the correct position. In light of the SX system serving a shared system as well as being a shared system with regards to CTS 3.7.4.1, the Bases for SR 3.7.7.2 should be modified to describe what is meant by "can be aligned to the correct position" with regard to the shared portions of the CC and SX Systems. Comment: Revise the Bases for SR 3.7.7.2 accordingly, and provide any additional discussion and justification as necessary.

ComEd Response to Issue

11/04/98 Revised Response: Insert B 3.7-39A for SR 3.7.7.2 has been revised to add, "This includes the ability to align the SX system as required to support unit-specific or opposite unit operations. It also includes assuring that the requirements of the ISI and IST programs are satisfied."

Original Response: No change. ComEd disagrees. The structure and wording of the SR Bases is consistent with other statements concerning valve alignments in other Bases. ComEd has procedures that identify the correct valve position of each associated valve for a specific plant/valve alignment. With plant procedures maintaining this level of detail, ComEd does not believe that the Bases also need to maintain this level of detail. For consistency, the entire ITS Bases would require review and revision to add this level of detail for similar SRs. ComEd continues to pursue this change.

Response to NRC RAI For ITS Section 3.7

05-Nov-98

NRC RAI Number	NRC Issued Date	RAI Status
3.7.8-02	12/5/97	Closed

NRC Description of Issue

3.7.8-2 DOC A.14

DOC LA.12

CTS 3.7.4.1

CTS 3.7.4.1 ACTION

In CTS 3.7.4.1 ACTION, LA.12 indicates a change has been made to refer to the Essential Service Water pump as the "SX trains" in two places; whereas the same change is justified in CTS 4.7.4.1 under A.14. A.14 is acceptable while LA.12 already applies to the relocation of CTS 3.7.4.1. Therefore, the CTS markup should be changed to be consistent. Comment: Revise the CTS markup and provide additional discussion and technical justification for this Administrative change.

ComEd Response to Issue

11/04/98 Revised Response: The CTS change associated with changing "pump" to "train" was annotated with a CTS DOC 'A1' designator.

Original Response: ComEd agrees that in the CTS 3.7.4.1 markup, the 'LA12' in the Actions should be changed to 'A13', consistent with the change made to CTS SR 4.7.4.1. This change will be provided in our comprehensive ITS Section 3.7 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.7 RAI.

ENCLOSURE 1

ITS REVISION R
ITS SECTION 3.7

BYRON ITS