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ComEd

November 19, 1998

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Subject: Application for Amendment to Appendix C, Additional Conditions to
Facility Operating Licenses

- References:
- (1) Letter from G. Stanley and K. Graesser (Commonwealth Edison) to U. S. NRC, "Conversion to the Improved Standard Technical Specifications," dated December 13, 1996.
 - (2) Letter from R. Assa (U. S. NRC) to O. Kingsley (Commonwealth Edison), "Byron and Braidwood Stations, Units 1 and 2 - Draft Safety Evaluation of Proposed Amendment on Improved Technical Specifications," dated November 5, 1998.
 - (3) Letter from T. Tulon (Commonwealth Edison) to U. S. NRC, "Revision H to the Improved Technical Specifications Submittal (ITS) - ITS Section 3.5 Closeout," dated July 30, 1998.
- 210004
- 1/1

Pursuant to 10 CFR 50.90, Commonwealth Edison (ComEd) Company proposes to amend Appendix C, Additional Conditions to Facility Operating License Nos. NPF-37, NPF-66, NPF-72, and NPF-77. In Reference 1, ComEd submitted proposed amendments to convert the Byron and Braidwood Current Technical Specifications (CTS) to the

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Improved Technical Specifications (ITS). As a requirement of this conversion, the NRC, in Reference 2, requested that ComEd propose two License Conditions to be incorporated into Appendix C of the Byron and Braidwood Operating Licenses. These proposed License Conditions are provided in the attachments to this letter.

In addition, ComEd is proposing to delete the current License Condition contained in Appendix C of the Byron and Braidwood Operating Licenses. This additional Condition, a Surveillance Requirement (SR) for verifying the Emergency Core Cooling System (ECCS) crossover piping is full of water, was added in Byron amendment number 100 and Braidwood amendment number 91, both dated January 30, 1998. In the conversion to the ITS, the details of verifying the ECCS piping is full of water have been incorporated into the Surveillance Requirements Section of the Bases for ITS SR 3.5.2.3. This change was discussed in Discussion of Change (DOC) 3.5-LA, submitted in Reference 3.

This proposed amendment request is subdivided as follows:

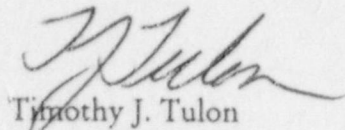
1. Attachment A gives a description of the proposed change in this amendment; and
2. Attachments B-1 and B-2 include the marked-up Appendix C pages, with the requested changes indicated for Byron and Braidwood, Units 1 and 2, respectively.

The deletion and additions to the Byron and Braidwood Appendix C do not require a new or revised "No Significant Hazards Consideration" nor any changes to the previously submitted "Environmental Assessment." This proposed amendment has been reviewed and approved in accordance with the requirements of ComEd's Quality Assurance Program.

ComEd is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated State Official.

Should you have any questions concerning this letter, please contact Mr. T. Simpkin at (815) 458-2801 extension 2980.

Respectfully,



Timothy J. Tulon
Site Vice President
Braidwood Station

Attachments: A - Description of Proposed Changes
B-1 - Byron Station Appendix C Mark-ups
B-2 - Braidwood Station Appendix C Mark-ups

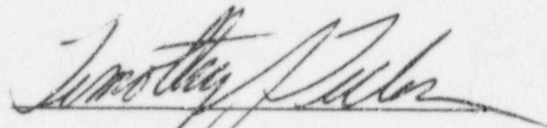
cc: Regional Administrator - USNRC, RIII
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Braidwood Station
Office of Nuclear Facility Safety - IDNS

STATE OF ILLINOIS)
COUNTY OF WILL)
IN THE MATTER OF)
COMMONWEALTH EDISON (COMED) COMPANY) Docket Numbers
BYRON STATION UNITS, 1 & 2) STN 50-454 & STN 50-455
AND)
BRAIDWOOD STATION, UNITS 1 & 2) STN 50-456 & STN 50-457

SUBJECT: Amendment to Appendix C, Additional Conditions to Facility Operating Licenses. This amendment request deletes an existing License Condition implemented by Byron amendment number 100 and Braidwood amendment number 91 and imposes two new License Conditions required by the NRC for the conversion of the Current Technical Specifications to the Improved Technical Specifications.

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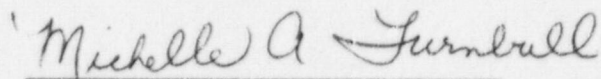
I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



Timothy J. Tulon
Site Vice President
Braidwood Station

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 19th day of
November, 1998.



Notary Public



ATTACHMENT A
DESCRIPTION AND SAFETY ANALYSIS
FOR PROPOSED CHANGE

A. SUMMARY OF PROPOSED CHANGES

Pursuant to 10 CFR 50.90, Commonwealth Edison (ComEd) Company proposes to amend Appendix C, Additional Conditions to Facility Operating License Nos. NPF-37, NPF-66, NPF-72, and NPF-77. There are three requested changes:

- 1) Delete the existing License Condition which requires a surveillance for verifying the Emergency Core Cooling System (ECCS) crossover piping is full of water;
- 2) Add a License Condition that defines the schedule for performance of new and revised Surveillance Requirements (SRs); and
- 3) Add a License Condition that will enforce the initial relocation of requirements from the Current Technical Specifications (CTS) to licensee-controlled documents.

The proposed changes are described in Section E of this Attachment A. The marked-up Appendices are provided in Attachments B-1 and B-2 for Byron and Braidwood Stations, respectively.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

The current License Condition added to Facility Operating License Nos. NPF-37 and NPF-66 by Byron amendment number 100, and to Facility Operating License Nos. NPF-72 and NPF-77 by Braidwood amendment number 91, both dated January 30, 1998, contains a requirement for verifying the ECCS crossover piping is full of water. This License Condition states:

"If the 31 day venting surveillance, TS 4.5.2.b, identifies gas present at either RH injection to cold leg isolation valve (SI8809A/B) vent valve (SI058A/B), the licensee shall UT the three gas traps associated with the ECCS crossover piping."

The proposed additions to Appendix C, which provide guidance on the schedule for performance of new and revised SRs and enforce the initial relocation of requirements from the CTS to licensee-controlled documents, are the result of the conversion to the Improved Technical Specifications (ITS) and as such no current requirements exist in the CTS.

C. BASES FOR THE CURRENT REQUIREMENTS

The Operating License, Appendix C License Condition describes the methods used to ensure that the ECCS piping is full of water. Verifying that the ECCS piping is full of water ensures that the ECCS flow path does not contain noncondensable gases which could challenge previously identified accident scenarios. The ECCS Operability requirements are still maintained in the Technical Specifications. However, with the requested deletion of the License Condition, the relocation of the details maintains consistency with NUREG-1431. Any change to these details will be made in accordance with the Bases Control Program described in ITS Section 5.5.14.

The proposed additions to Appendix C, which provide guidance on the schedule for performance of new and revised SRs and enforce the initial relocation of requirements from the CTS to licensee-controlled documents, are the result of the conversion to ITS and as such no current requirements exist in the CTS.

D. NEED FOR REVISION OF THE REQUIREMENT

The details of the current License Condition, which requires that Byron and Braidwood verify that the ECCS crossover piping is full of water, have been relocated into the Surveillance Requirements Section of the Bases for ITS SR 3.5.2.3 by Reference 3. Therefore, it will not be necessary to maintain this License Condition in the ITS.

The new License Conditions proposed for inclusion in Appendix C for Byron and Braidwood are being added at the request of the NRC. As stated by the NRC in Reference 2:

"We request that you propose two License Conditions to be incorporated in the Byron and Braidwood operating licenses: (1) to make enforceable those current TS requirements to be transferred into licensee-controlled documents (e.g., the Updated Final Safety Analysis Report, Quality Assurance Program topical report and Technical Requirements Manual), and (2) to define when the first performance of modified or new Surveillance Requirements is due following implementation of the Byron and Braidwood iSTS."

E. DESCRIPTION OF THE PROPOSED CHANGE

The current License Condition, which requires that Byron and Braidwood verify that the ECCS crossover piping is full of water, will be deleted from Appendix C of the Facility Operating Licenses for both Byron and Braidwood. The details for ensuring that the ECCS piping is maintained full of water have been relocated into the Surveillance Requirements Section of the Bases for ITS SR 3.5.2.3 by Reference 3.

The proposed addition to Appendix C, which provides guidance on the schedule for performance of new and revised SRs states:

"For SRs that are new in Amendment [] to Facility Operating License [], the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment []. For SRs that existed prior to Amendment [], including SRs with modified acceptance criteria and SRs whose intervals of performance are being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment []. For SRs that existed prior to Amendment [], whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of Amendment []."

The proposed implementation date for this addition is within 180 days of the issuance of the ITS conversion amendment. This schedule is reasonable considering the large volume of site-specific work necessary to complete implementation of the amendments.

The proposed addition to Appendix C, which will enforce the initial relocation of requirements from the CTS to licensee-controlled documents states:

"This amendment authorizes the relocation of certain Technical Specification requirements to licensee-controlled documents. Implementation of this amendment shall include the initial relocation of these Technical Specification requirements to the appropriate documents, as described in Table LA, Details Relocated from CTS, and Table R, Relocated CTS."

The proposed implementation date for this addition is also within 180 days of the issuance of the ITS conversion amendment. This schedule is reasonable considering the large volume of site-specific work necessary to complete implementation of the amendments.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGE

For the deletion of the existing License Condition, the details which require that Byron and Braidwood verify that the ECCS crossover piping is full of water, have been relocated into the Surveillance Requirements Section of the Bases for ITS SR 3.5.2.3 by Reference 3. As stated in Discussion of Change (DOC) 3.5-LA₇, in the Reference 3 submittal:

"CTS SR 4.5.2.b.1) and b.3) as well as the Operating License, Appendix C License Condition, provide details describing the methods used to ensure that the ECCS piping is full of water. These details are relocated to the ITS Bases. These details are not necessary to ensure the Operability of the ECCS. The requirements of ITS LCO 3.5.2 and the associated Surveillance Requirements are adequate to ensure the ECCS are maintained Operable. As a result, the methods of performing Surveillances are not necessary to ensure the ECCS can perform their intended safety function and the details are not required to be in the TS or License Condition to provide adequate protection of the public health and safety. The relocation of these details maintains consistency with NUREG-1431. Any change to these details will be made in accordance with the Bases Control Program described in ITS Section 5.5."

Therefore, there is no safety impact from deleting this License Condition in the ITS.

The proposed addition to Appendix C, which provides guidance on the schedule for performance of new and revised SRs, provides NRC approved clarification to the frequency of new and revised SRs. This is added assurance to maintaining an accurate and consistent surveillance schedule during the CTS to ITS transition.

The proposed addition to Appendix C, which will enforce the initial relocation of requirements from the CTS to licensee-controlled documents, adds an enforceable commitment. This increases the control and oversight of relocated requirements. Such a License Condition is important to the ITS conversion because the acceptability of removing certain requirements from the CTS is based on those requirements being relocated to licensee-controlled documents where further changes to the requirements will be controlled by the regulations (e.g., in accordance with 10 CFR 50.59).

G. IMPACT ON PREVIOUS SUBMITTALS

These Appendix C proposed changes are to be incorporated into the Byron and Braidwood ITS amendment that requests conversion to the ITS (Reference 1).

H. SCHEDULE REQUIREMENTS

ComEd requests a review schedule so as to incorporate these changes into the Byron and Braidwood ITS conversion amendment. Based on the current status of the ITS conversion review, approval of these proposed changes is requested by mid-December 1998.

ATTACHMENT B-1

MARKED-UP PAGES FOR PROPOSED CHANGE
TO APPENDIX C, ADDITIONAL CONDITIONS

BYRON STATION, UNITS 1 & 2

BYRON INSERT

INSERT A-1: For SRs that are new in Amendment 106 to Facility Operating License NPF-37, the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment 106. For SRs that existed prior to Amendment 106, including SRs with modified acceptance criteria and SRs whose intervals of performance are being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 106. For SRs that existed prior to Amendment 106, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of Amendment 106.

INSERT A-2: For SRs that are new in Amendment 106 to Facility Operating License NPF-66, the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment 106. For SRs that existed prior to Amendment 106, including SRs with modified acceptance criteria and SRs whose intervals of performance are being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 106. For SRs that existed prior to Amendment 106, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of Amendment 106.

INSERT B: This amendment authorizes the relocation of certain Technical Specification requirements to licensee-controlled documents. Implementation of this amendment shall include the initial relocation of these Technical Specification requirements to the appropriate documents, as described in Table LA, Details Relocated from CTS, and Table R, Relocated CTS.

INSERT C: Shall be implemented within 180 days after issuance of Amendment 106

APPENDIX C

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. NPF-37

Commonwealth Edison Company shall comply with the following conditions on the schedules noted below:

<u>Amendment Number</u>	<u>Additional Condition</u>	<u>Implementation Date</u>
100	If the 31 day venting surveillance, TS 4.5.2.b, identifies gas present at either RH injection to cold leg isolation valve (SI8809A/B) vent valve (SI058A/B), the licensee shall UT the three gas traps associated with the ECCS crossover piping.	Shall be implemented within 30 days after issuance of Amendment No. 100

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INSERT A-1

INSERT C

[]

INSERT B

INSERT C

AMENDMENT NO. ~~100~~

APPENDIX C

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. NPF-66

Commonwealth Edison Company shall comply with the following conditions on the schedules noted below:

<u>Amendment Number</u>	<u>Additional Condition</u>	<u>Implementation Date</u>
100	If the 31 day venting surveillance, TS 4.5.2.b, identifies gas present at either RH injection to cold leg isolation valve (SI8809A/B) vent valve (SI058A/B), the licensee shall UT the three gas traps associated with the ECCS crossover piping.	Shall be implemented within 30 days after issuance of Amendment No. 100

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INSERT A-2

INSERT C

[]

INSERT B

INSERT C

AMENDMENT NO. ~~100~~

ATTACHMENT B-2

MARKED-UP PAGES FOR PROPOSED CHANGE
TO APPENDIX C, ADDITIONAL CONDITIONS

BRAIDWOOD STATION, UNITS 1 & 2

BRAIDWOOD INSERT

INSERT A-3: For SRs that are new in Amendment 98 to Facility Operating License NPF-72, the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment 98. For SRs that existed prior to Amendment 98, including SRs with modified acceptance criteria and SRs whose intervals of performance are being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 98. For SRs that existed prior to Amendment 98, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of Amendment 98.

INSERT A-4: For SRs that are new in Amendment 98 to Facility Operating License NPF-77, the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment 98. For SRs that existed prior to Amendment 98, including SRs with modified acceptance criteria and SRs whose intervals of performance are being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 98. For SRs that existed prior to Amendment 98, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of Amendment 98.

INSERT B: This amendment authorizes the relocation of certain Technical Specification requirements to licensee-controlled documents. Implementation of this amendment shall include the initial relocation of these Technical Specification requirements to the appropriate documents, as described in Table LA, Details Relocated from CTS, and Table R, Relocated CTS.

INSERT C: Shall be implemented within 180 days after issuance of Amendment 98

APPENDIX C

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. NPF-72

Commonwealth Edison Company shall comply with the following conditions on the schedules noted below:

Amendment
Number

Additional Condition

Implementation
Date

91

If the 31 day venting surveillance, TS 4.5.2.b, identifies gas present at either RH injection to cold leg isolation valve (S18809A/B) vent valve (S1058A/B), the licensee shall UT the three gas traps associated with the ECCS crossover piping.

Shall be implemented within 30 days after issuance of Amendment No. 91

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INSERT A-3

INSERT C

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INSERT B

INSERT C

AMENDMENT NO. 91

APPENDIX C

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. NPF-77

Commonwealth Edison Company shall comply with the following conditions on the schedules noted below:

Amendment
Number

Additional Condition

Implementation
Date

~~91~~

If the 31 day venting surveillance, TS 4.5.2.b, identifies gas present at either RH injection to cold leg isolation valve (SI8809A/B) vent valve (SI058A/B), the licensee shall UT the three gas traps associated with the ECCS crossover piping.

Shall be implemented within 30 days after issuance of Amendment No. 91

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INSERT A4

INSERT C

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INSERT B

INSERT C

AMENDMENT NO. ~~91~~