

PLANT SYSTEMS

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least two independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

- a. One motor-driven auxiliary feedwater pump capable of being powered from an ESF Bus, and
- b. One direct-driven diesel auxiliary feedwater pump capable of being powered from a direct-drive diesel engine and an OPERABLE Diesel Fuel Supply System consisting of a day tank containing a minimum ~~level of~~ ~~71%~~ 420 gallons of fuel.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With one auxiliary feedwater pump inoperable, restore the required auxiliary feedwater pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With both auxiliary feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.2.1 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by:
 - 1) Verifying that the pump develops a differential pressure of greater than or equal to 1825 psid at a flow of greater than or equal to 85 gpm on the recirculation flow when tested pursuant to Specification 4.0.5;

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INSTRUMENTATION

SEISMIC INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.3 The seismic monitoring instrumentation shown in Table 3.3-7 shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the above required seismic monitoring instruments inoperable for more than 30 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.3.1 The seismic monitoring instrumentation shall be determined OPERABLE:

- a. At least once per 31 days by verifying operable status indications of the seismic monitoring instrumentation.
- b. At least once per 92 days by verifying that:
 - 1) The triaxial acceleration sensors and the time-history accelerographs properly process the equipment internal test signals.
 - 2) The response spectrum analyzer properly executes its diagnostic routine.
- c. At least once per 184 days by verifying that the triaxial acceleration sensors and the time-history accelerographs properly record the equipment internal test signals. The test may be performed in lieu of the test required by Specification 4.3.3.3.1.b.1), and
- d. At least once per 18 months ~~during shutdown~~ by:
 - 1) Verifying the electronic calibration of the time-history accelerographs.
 - 2) Installing fresh magnetic recording plates in the triaxial peak accelerographs.

4.3.3.3.2 Upon actuation of the seismic monitoring instruments, the equipment listed in Table 3.3-7 shall be restored to OPERABLE status within 24 hours following the seismic event. Data shall be retrieved from actuated instruments and analyzed to determine the magnitude of the vibratory ground motion. A Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 14 days describing the magnitude, frequency spectrum and resultant effect upon facility features important to safety.

ATTACHMENT 2

Summary of Changes

Two changes have been identified in the Byron Station Technical Specifications due to differences between Unit 1 and Unit 2, or are administrative in nature as indicated below:

- 1) Page 3/4 3-44, Surveillance Requirements 4.3.3.3.1d

Delete the words ", during shutdown," and the comma preceeding and following the words, so the sentence reads: "At least once per 18 months by:

- 2) Page 3/4 7-4, Auxiliary Feedwater System, Limiting Condition for Operation 3.7.1.2.b.

Delete the words "level of 71%" and insert "of" in its place. Also, remove the parenthesis surrounding 420 gallons, so the sentence reads: "One direct-driven diesel engine and an OPERABLE Diesel Fuel Supply System consisting of a day tank containing a minimum of 420 gallons of fuel.

ATTACHMENT 3
Evaluation of Significant Hazards
Consideration

A. Seismic Instrumentation (page 3/4 3-44)

Description of Amendment Request

The requested change deletes "during shutdown" for the surveillance requirement. This procedure can be done in any mode and does not require shutdown conditions. As currently worded, both Byron Units 1 and 2 and Braidwood Units 1 and 2 would need to be shutdown for the performance of this surveillance.

The reason this constraint was originally imposed was due to ALARA considerations. Although the seismic monitors are located inside containment, the tests are performed outside containment. Therefore, ALARA is not a pertinent issue in determining when these surveillances are performed.

This proposed change is also applicable to Braidwood and, if approved, should be included in the draft Braidwood Technical Specifications.

Basis for Proposed No Significant Hazards Consideration Determination

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. In accordance with the criteria of 10CFR 50.92(c), the proposed amendment does not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:
 - (a) the proposed amendment does not alter the manner in which the surveillances are performed. The change merely allows the option of doing the seismic instrumentation surveillances while the units are in operation. The seismic instrumentation does not perform a protective function; changing the mode of operation during which the surveillances are performed does not cause a significant increase in the probability or consequences of a previously evaluated accident.

- (2) Create the possibility of a new or different kind of accident from an accident previously evaluated; because:
 - (a) the sole purpose of these instruments is to perform a monitoring function. Therefore, changing the mode of operation during which these tests are done does not create the possibility of a new or different kind of accident from an accident previously evaluated.
 - (b) This is an administrative change which would permit surveillances to be performed while the units are operating.
- (3) Involve a significant reduction in the margin of safety, because:
 - (a) there is no margin of safety associated with these seismic monitoring instruments.

Based on the preceeding assessment, Commonwealth Edison has determined that the proposed amendment involves no significant hazards consideration and request its approval in accordance with the provisions of 10CFR 50.91(a)(4).

B. Auxiliary Feedwater System (page 3/4 7-4)

Description of Amendment Request

The requested change is to replace the words "minimum level of 71% (420 gallons) of fuel" for the diesel fuel supply system day tank (specification 3.7.12), with "minimum of 420 gallons of fuel". This change is sought to remove the 71% reference from the Technical Specifications.

The 71% figure is based on level indication which is a function of the diesel fuel supply system day tank dimensions. The dimensions of the Unit 1 and Unit 2 day tanks differ, hence, the 71% reference is not valid for Unit 2. The minimum required level of 420 gallons is correct for both units and is not being altered. This change is therefore considered an administrative change for clarification.

This proposed Technical Specification change is also applicable to Braidwood and, if approved, should be included in the draft Braidwood Technical Specifications.

Basis for No Significant Hazards Consideration

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. In accordance with the criteria of 10CFR 50.92(c), the proposed amendment does not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:
 - (a) the proposed amendment does not alter the minimum required level of fuel in the diesel fuel supply system for the direct driven diesel auxiliary feedwater pump.
 - (b) The amendment merely deletes references to "71%" to eliminate confusion due to different instrument spans and physical tank capacity on Unit 1 and Unit 2.
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:
 - (a) the proposed amendment does not allow any new equipment or modes of operation which could initiate or effect the control of a transient or accident because the minimum required level of fuel for the DFSS day tank is not being altered.
- (3) Involve a significant reduction in the margin of safety, because:
 - (a) there are no changes being made to hardware, or in the manner that the system is being operated. Hence, the margin of safety is not being compromised or changed. This proposed licensing amendment should be considered an administrative change.

Based on the preceeding assessment, Commonwealth Edison has determined that this proposed amendment involves no significant hazards consideration and requests its approval in accordance with the provisions of 10CFR 50.91(a)(4).