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Safety Evaluation Summary Form

Tracking No. 6G-99-0007
Activity No. ER 9809489

DESCRIPTION:

ER 9809489 evaluates the installation of a temporary freeze seal on line 2RH03AB-8" to support maintenance activities on valve 2RH026B. This line is on the outlet of the 2B residual heat removal heat exchanger 2RH02AB. The freeze seal made up the out of service boundary for the maintenance activities. This section of line along with the 2B RH pump will be removed from service during the maintenance. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0013
Activity No. ER 9900635

DESCRIPTION:

ER 9900635 evaluates the installation of a temporary freeze seal on line 2SX05BB-3" to support maintenance activities on valve 2SX124B. This line is the return line from cubicle cooler 2VA06SB. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0021
Activity No. ER 9901318

DESCRIPTION:

ER 9901318 evaluates the installation of a temporary freeze seal on line 2CC06A-1" to support maintenance activities on valve 2CC2092. This section of line and the Unit 2 CC chemical addition tank 2CC03M will be removed from service during the maintenance activity. The freeze seal will be making up an out of service boundary for the maintenance activity. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0038
Activity No. ER 9801688

DESCRIPTION:

ER 9801688 evaluates the installation of a temporary freeze seal on line 1SX04EB-3" to support maintenance activities on valve 1SX2014C. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0047
Activity No. ER 9902849

DESCRIPTION:

ER 9902849 evaluates the installation of a temporary freeze seal on lines 1SI18FC-2" and 1SI18EC-2" as part of a secondary isolation boundary to support maintenance activities on check valve 1SI8819C. This section of line will be removed from service for the maintenance activities. This work will be done while Unit 1 is in Modes 5, 6, or defueled. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0085
Activity No. ER 9809278

DESCRIPTION:

ER 9809278 evaluates the installation of a temporary freeze seal on line 2SX16AA-3" to support maintenance activities on valve 2SX2157C, 2SX2157A, 2SX2158C, and 2SX2158A. The freeze seal will be located upstream of cubicle cooler 2VA01SA. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0092 Revision 1
Activity No. ER 9904496 and ER 9904557

DESCRIPTION:

ER 9904496 and ER 9904557 evaluate the installation of freeze seals on lines 1RC21BB-8" and 1RC21AB-8" to support maintenance activities on the sockolet for line 1RC23AB-3/4". The line is classified as safety related and has been seismically analyzed. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0152 Revision 1
Activity No. ER 9904331

DESCRIPTION:

ER 9904331 evaluates the installation of a temporary freeze seal on line 2SI16CA-1 1/2" to support maintenance activities on valve 2SI8814. The freeze seal was located between seismic supports. The line is classified as safety related and has been seismically analyzed. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0007
Activity No. ER 9809339

DESCRIPTION:

ER 9809339 evaluates the installation of a temporary freeze seal on line 2SX47A-1 1/2" to support maintenance activities on valve 2SX2084. This line is the inlet line to cubicle cooler 2VA05S for the positive displacement pump. The freeze seal made up the Out of Service (OOS) boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0026
Activity No. ER 9901195

DESCRIPTION:

ER 9901195 evaluates the installation of a temporary freeze seal on line 2WG04HH-1" to support maintenance activities on valve 2WG013R. The freeze seal made up the out of service boundary and will provide isolation while work is performed on valve 2WG013R. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure. The 2A Condensate Booster pump (2CB01PA) and related equipment will be removed from service during the work activities.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0104
Activity No. ER 9901696

DESCRIPTION:

ER 9901096 evaluates the installation of a temporary freeze seal on line 2SX58AB-2" to support maintenance activities on valve 2SX197B. The freeze seal will be making up an out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure. The 2B centrifugal charging pump lube oil cooler and other related equipment will be removed from service during the work activities.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0116Activity No. ER 9808889DESCRIPTION:

ER 9808889 evaluates the installation of a temporary freeze seal on line 1CC48BB-1" to support maintenance activities on relief valve 1CC9412C. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0245Activity No. ER 9905235DESCRIPTION:

ER 9905235 evaluates the installation of a temporary freeze seal on line 0WSK2A-2' to support maintenance activities for line replacement on the OC non-essential service water (WS) pump upper bearing motor cooler. This line is classified as non-safety related. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0249
Activity No. ER 9904980

DESCRIPTION:

ER 9904980 evaluates the installation of a temporary freeze seal on line 2FW06AA-4" to support maintenance activities for installation of a blank at the test flange connection, 2AF06MA. The line is classified as safety related ASME Class II. The freeze seal made up the out of service boundary for the maintenance activities. This work activity will be done when Unit 2 is in Mode 5. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0251Activity No. ER 9905336DESCRIPTION:

The proposed activity is a temporary modification to provide alternate cooling to the OC non-essential service water (WS) pump motor bearings.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The temporary modification affects only the non-essential service water (WS) system. The WS system is not safety-related. The essential loads required for the safe shutdown of the plant are serviced by the essential service water (SX) system. The WS system is designated Safety Category II, Quality Group D. Therefore, the evaluations contained within the safety analysis report (SAR) are not altered as a result of the temporary modification to the WS system.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The temporary modification affects only the WS located in the circulating water pump house (CWPH). No equipment is located in the CWPH that could cause an interaction with the WS system and equipment important to safety. Therefore, no new accident or malfunction is created which is of a different type than those already contained in the SAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The temporary modification is to the WS system only. The WS system is not safety-related. No credit is taken for the operation of the WS to mitigate the consequences of any accident as described in the SAR. No new interactions with safety-related systems are created by the installation of the temporary modification. Therefore, since there is no effect on safety-related equipment or systems, no reduction in the margin of safety exists as a result of the temporary modification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0260Activity No. ER 9808993DESCRIPTION:

The proposed activity changed the part number of the control room chiller chilled water element (OTE-WO228) to increase the quality assurance requirements.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The changes to the part number did not involve any physical changes to the part. The change of part number was an increase in quality assurance level. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The changes to the part number did not involve any physical changes to the part. The change of part number was an increase in quality assurance level. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Technical Specifications are unaffected because there are no physical changes to the plant associated with the change in part number.

Safety Evaluation Summary Form

Tracking No. 6H-99-0287Activity No. ER 9904983DESCRIPTION:

ER 9904983 evaluates the installation of a temporary freeze seal on line 2FW06AD-4" to support maintenance activities for installation of a blank at test flange connection 2AF06MD. This line is classified as safety related ASME Class II. The freeze seal made up the out of service boundary for the maintenance activities. This work activity will be done when Unit 2 is in Mode 5, 6, or defueled. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Out of service conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that a malfunction of a different type is not created.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0287Activity No. ER 9904983

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The temporary installation of the freeze seal is done while the component/system is removed from service and with Unit 2 in Mode 5, 6, or defueled. Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

Safety Evaluation Summary Form

Tracking No. 6H-99-0288Activity No. ER 9904981DESCRIPTION:

ER 9904981 evaluates the installation of a temporary freeze seal on line 2FW06AC-4" to support maintenance activities for installation of a blank at test flange connection 2AF06MC. This line is classified as safety related ASME Class II. The freeze seal made up the out of service boundary for the maintenance activities. This work activity will be done when Unit 2 is in Mode 5, 6, or defueled. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Out of service conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that a malfunction of a different type is not created.

Safety Evaluation Summary Form

Tracking No. 6H-99-0288Activity No. ER 9904981

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The temporary installation of the freeze seal is done while the component/system is removed from service and with Unit 2 in Mode 5, 6, or defueled. Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0289Activity No. ER 9904982DESCRIPTION:

ER 9904982 evaluates the installation of a temporary freeze seal on line 2FW06AB-4" to support maintenance activities for installation of a blank at test flange connection 2AF06MB. This line is classified as safety related ASME Class II. The freeze seal made up the out of service boundary for the maintenance activities. This work activity will be done when Unit 2 is in Mode 5, 6, or defueled. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Out of service conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that a malfunction of a different type is not created.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0289Activity No. ER 9904982

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The temporary installation of the freeze seal is done while the component/system is removed from service and with Unit 2 in Mode 5, 6, or defueled. Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

Safety Evaluation Summary Form

Tracking No. 6H-99-0294

Activity No. ER 9905776DESCRIPTION:

ER 9905776 evaluates the installation of a temporary freeze seal on line 0PW43A-4" to support maintenance activities for weld repair. The line is classified as non-safety related and is located in the turbine building. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0296
Activity No. ER 9905909

DESCRIPTION:

ER 9905909 evaluates the installation of a temporary freeze seal on line 2WSA9BD-2" to support maintenance activities for valve repair. The line is classified as non-safety related and is located in the turbine building. The freeze seal will provide an out of service boundary upstream of valve 2WS412D. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0299
Activity No. ER 9904978

DESCRIPTION:

ER 9904978 evaluates the installation of a temporary freeze seal on line 0WW01D-6" to support maintenance activities (pipe spool replacement). The line is classified as non-safety related and is located in the turbine building. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0308Activity No. ER 9906443DESCRIPTION:

ER 9906443 evaluates the installation of a temporary freeze seal on line 2CC49B-1" to support maintenance activities on valve 2CC9421A. The line is classified as safety-related and has been seismically analyzed. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0309Activity No. ER 9906445DESCRIPTION:

ER 9906445 evaluates the installation of a temporary freeze seal on line 2CC48BA-1" to support maintenance activities on valve 2CC9421B. The line is classified as safety-related and has been seismically analyzed. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0312
Activity No. ER 9906444

DESCRIPTION:

ER 9906444 evaluates the installation of a temporary freeze seal on line 2CC48BB-1" to support maintenance activities on valve 2CC9421C. The line is classified as safety-related and has been seismically analyzed. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0314
Activity No. ER 9907142

DESCRIPTION:

ER 9907142 evaluates the installation of a temporary freeze seal on line 1WSA9BD-2" to support maintenance activities for valve repair/replacement of valve 1WS412D. The line is classified as non-safety related and is located in the Turbine building. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0315
Activity No. ER 9906340

DESCRIPTION:

ER 9906340 evaluates the installation of a temporary freeze seal on line 0WSK2A-2" to support maintenance activities on a non-essential service water (WS) pump. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure. The WS pump and other related equipment will be removed from service during the maintenance activity.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The affected component/system are reviewed to determine the overall impact resulting from the isolation created by the freeze seal. Conditions are established as necessary to ensure the correct level of administrative control is applied to the freeze seal evolution. The altered configuration of the system was evaluated and determined to be acceptable. Failure of a freeze seal is a slow deterioration of the pressure boundary that is detected by evidence of a slowly developing leak. Contingencies approved in the freeze seal controls ensure that restoration of the system is immediately performed at the onset of a detected leak. This ensures that an accident or malfunction of a different type is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0383
Activity No. ER 9907477

DESCRIPTION:

ER 9907477 evaluates the installation of a temporary freeze seal on line 1WS17BB-2" to support maintenance activities on valve 1WS413B. The line is classified as non-safety related and is located in the turbine building. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0388
Activity No. ER 9908256

DESCRIPTION:

ER 9908256 evaluates the installation of a temporary freeze seal on line 2RC36A-3" to support maintenance activities on valve 2RC8085. The line is classified as safety related and has been seismically analyzed. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0389
Activity No. ER 99082500

DESCRIPTION:

ER 9908250 evaluates the installation of a temporary freeze seal on line 2RC37A-3" to support maintenance activities on valves 2CV8378A and 2CV8378B. The line is classified as safety related and have been seismically analyzed. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure. The actual freeze seal will be installed while Unit 2 is defueled. The freeze jacket will be installed in Mode 6.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0394
Activity No. ER 9908583

DESCRIPTION:

ER 9908583 evaluates the installation of a temporary freeze seal on line 1SIF7AB-3/4" to support maintenance activities on valve 1SI059B. The line is classified as safety-related and has been seismically analyzed. The freeze seal made up the out of service boundary for the maintenance activities. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Installation of the freeze seal does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-01-0003
Activity No. ER 9917493

DESCRIPTION:

ER 9917493 evaluates the installation of a temporary freeze seal on line 1SX58AA-2". The freeze seal will form an isolation boundary between valve 1SX2199A and the 3" supply header. This line is the Unit 1 Train A essential service water (SX) supply to the 1A centrifugal charging (CV) pump gear and lube oil coolers. The 1A CV pump and related equipment will be removed from service during the maintenance activities. Since SX will still be considered operable, contingency plans will include having available a hose/valve or pipe plug to be installed should the freeze seal fail. Isolation valves are also available to isolate sections of the Train A SX system.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Safety Evaluation Summary Form

Tracking No. 6G-01-0003

Activity No. ER 9917493

The installation of the freeze seal does not impact any Technical Specifications for CV or SX because the systems will be removed from service with the appropriate actions entered during the time the freeze seal is installed.

Safety Evaluation Summary Form

Tracking No. 6G-01-0006
Activity No. ER 9917207

DESCRIPTION:

ER 9917207 evaluates the installation temporary freeze seal(s) on lines 1SI05DD-6" and 1SI05CD-8" as part of a contingency plan should check valve 1SI8818D require repair. The freeze seal(s) will form a secondary isolation boundary on both sides of check valve 1SI8818D. Additional check and isolation valves will provide the primary isolation boundary. These lines are the cold leg accumulator injection lines. Unit 1 will be in Modes 4 (with one train of emergency core cooling system (ECCS) operable), 5, or 6 when the maintenance activity would be performed. Contingency plans will include having available the valve bonnet or a cover to be installed should the freeze seal fail.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR. The check and isolation valves are available to provide the primary isolation boundary.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

This activity will be performed when Unit 1 is in Modes 5 or 6 or in Mode 4 with one train of ECCS operable. The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Safety Evaluation Summary Form

Tracking No. 6G-01-0006
Activity No. ER 9917207

The installation of the freeze seal does not impact any Technical Specifications for the safety injection or ECCS systems because the systems will be removed from service with the appropriate actions entered during the time the freeze seal is installed.

Safety Evaluation Summary Form

Tracking No. 6G-01-0014
Activity No. ER 9918456

DESCRIPTION:

ER 9918456 evaluates the installation of a temporary freeze seal on line 2WS17BB-2". The freeze seal will form an isolation boundary between valve 2WS413B and the 3" return header. Line 2WS17BB-2" is the 2B condensate/condensate booster (CD/CB) pump and gear lube oil cooler(s) return line. The coolers and related equipment will be removed from service during this activity. Contingency plans will include using a temporary hose/valve to ensure system integrity while valve 2WS413B is removed and replaced.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

There will not be a change to the normal plant configuration for the WS system. The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

This activity will be performed when the 2B CD/CB pump, gear lube oil cooler(s), and related equipment are removed from service. The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Safety Evaluation Summary Form

Tracking No. 6G-01-0014
Activity No. ER 9918456

The installation of the freeze seal on the non-essential service water system does not impact any Technical Specifications. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6G-01-0021
Activity No. ER 9918581

DESCRIPTION:

ER 9918581 evaluates the installation of a temporary freeze seal on line 0WSA5A-3". The freeze seal will be used to isolate the section of piping for replacement of valve 0WS211. The freeze seal will form an isolation boundary between the 20" return header and valve 0WS211. Line 0WSA5A-3" is the non-essential service water (WS) outlet return line from primary sample cooler OPS18A. The primary sample cooler and related equipment will be removed from service during this activity.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The installation of the freeze seal on the WS system does not impact any Technical Specifications. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6G-01-0022
Activity No. ER 9918582

DESCRIPTION:

ER 9918582 evaluates the installation of a temporary freeze seal on line 0WSA4A-3". The freeze seal will be used to isolate the section of piping for replacement of valve 0WS212. The freeze seal will form an isolation boundary between the 20" return header and valve 0WS212. Line 0WSA4A-3" is the non-essential service water (WS) inlet supply line to the primary sample cooler 0PS18A. The primary sample cooler and related equipment will be removed from service during this activity.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The effects on the system as a result of the freeze seal installation were evaluated and were determined to be acceptable. The engineering review determined the freeze seal would not adversely affect the material strength of the piping system. A freeze seal is equivalent to an isolation valve and a failure of the freeze seal is detected by the initial slow leakage across the freeze seal boundary. Contingencies are in place to restore the system pressure boundary in the event of a freeze seal failure. A freeze seal failure is not a precursor to any of the accidents postulated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The installation of the freeze seal on the WS system does not impact any Technical Specifications. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

50.59 REVIEW COVERSHEET FORM

50.59 Evaluation No.: 6G-01-0030

Station: Byron

Activity/Document Number: ECR 351478

Revision Number: 0

Title: Temporary Freeze Seal for 1CC9420 Relief Valve Repair

Description of Activity:

ECR evaluates the installation of temporary freeze seals on line 1CC08B-2". The freeze seals will form an isolation boundary between relief valve 1CC9420 and the 2" component cooling pump suction line. This is the suction line to the component cooling pumps from sample cooler panel 1PS29J. The sample cooler and related equipment will be removed from service during the maintenance activity. This activity can be performed while Unit 1 is in Mode 1.

Reason for Activity:

Relief valve 1CC9420 requires replacement. No valves are available to isolate the discharge side of the relief valve. Therefore, two freeze seals are required. The first freeze seal is the primary freeze and the second freeze is considered a contingency should the first freeze fail.

Effect of activity:

The freeze seals will be installed as a pressure boundary on line 1CC08B-2". This will isolate relief valve 1CC9420 from the process fluid so that maintenance work can be performed at the valve.

Summary of Conclusion for the Activities 50.59 Review:

This activity will be performed when Unit 1 is in Mode 1 with the sample cooler and related equipment removed from service. The freeze seals will be installed using approved procedures and the freeze jacket weight(s) have been evaluated and have been found acceptable. The freeze seals are considered equal to a valve and will be removed prior to the sample cooler being returned to service. The required system functions and operating requirements as defined in the Technical Specifications for the component cooling (CC) system do not change. Approved contingency plans, defined in procedure CC-AA-403, will be in place in the event of a freeze seal failure. Therefore, the proposed change does not create the possibility of an accident of a type different from those evaluated in the UFSAR. The proposed change to the CC system does not increase the frequency of occurrence of an accident because operation of the CC system or any of its components is not a precursor to the accidents described in UFSAR Chapter 15. The activity does not change the method of evaluation and does not impact the design basis limits for fission product barriers.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

50.59 REVIEW COVERSHEET FORM**50.59 Evaluation No.:** 6G-01-0030**Forms Attached:** (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.		Rev. <u> </u>
<input checked="" type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.	<u>6G-01-0030</u>	Rev. <u> 0 </u>
<input type="checkbox"/>	50.59 Validation	50.59 Validation No.		Rev. <u> </u>

Safety Evaluation Summary Form

Tracking No. 6H-01-0035
Activity No. ER 9917869

DESCRIPTION:

The proposed activity provides guidelines for staging temporary lead shielding blankets inside the Unit 2 containment during Modes 1 through 4 prior to refueling outage B2R09. The temporary lead shielding (blankets) will be removed from the Unit 2 containment prior to Mode 4 start-up from B2R09. The amount of shielding will be limited to 18000 pounds and will be located on elevations 401' and 412'.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The lead blankets will be staged on elevations 401' and 412' in the areas that will be sufficiently removed from any safety related systems, structures, and components (SSCs) and therefore will not affect equipment failure or malfunction. The result of the Engineering review performed for added blankets has been found acceptable. No new failure modes are created due to temporary staging (at the specified locations) of the blankets inside the containment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

All issues related to the lead blankets inside the containment have been evaluated and found to be acceptable. The staging of lead blankets on elevations 401' and 412' at the specified locations will not create an accident or transient of a different type.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are directly impacted by this change. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

50.59 REVIEW COVERSHEET FORM

LS-AA-104-1001

01/11/01

ation: Byron

Page 1 of 2

Activity/Document Number: ER 9919193

Revision Number: 0

Title: Temporary Freeze Seal for 2AF017B

Description of Activity:

ER 9809489 evaluates the installation of a temporary freeze seal on line 2SXB7A-8" for the replacement of valve 2AF017B. Line 2SXB7A-8" is the essential service water (SX) inlet supply line to the 2B auxiliary feedwater (AF) pump and engine driven cooling pump 2SX04P. The freeze seal will be used to isolate the section of piping to allow work on 2AF017B. The freeze seal will form an isolation boundary between the 14" supply header and valve 2AF017B. This activity is to be performed while Unit 2 is in Modes 4, 5, 6, or defueled. The 2B AF pump and related equipment will be removed from service during this activity. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

Reason for Activity:

The temporary freeze seal will provide the ability to isolate the 2B AF components from the in-service portion of the SX system to allow for replacement of valve 2AF017B.

Effect of Activity:

The freeze jacket will be installed on an operable line while work is done for valve 2AF017B. This activity will isolate the SX supply to the 2B AF pump, engine driven cooling water pump (2SX04P), and gear and lube oil coolers. The activity will be performed while Unit 2 is in Modes 4, 5, 6 or defueled which has no effect on the 2B AF pump as it will be removed from service for the duration of the work activity and is not required to be operable in Modes 4, 5, 6, or defueled.

Summary of Conclusion for the Activities 50.59 Review:

This activity will be performed when the 2B AF pump and related equipment are removed from service in Modes 4, 5, 6, or defueled. The freeze seal will be installed using approved procedures and the freeze jacket weight has been evaluated and found acceptable. Contingency plans will be in place should the freeze seal fail. The temporary freeze seal does not have any impact on the results of the design basis evaluation discussed in the UFSAR. Additionally, the operation of plant equipment required to mitigate the consequences of design basis events is not degraded since the AF pump is not required to be operable when the activity is being performed. Therefore, the consequences of evaluated accidents or transients are not increased.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if multiple discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.	_____	Rev. _____
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.	_____	Rev. _____
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	6H-01-0042	Rev. 0

50.59 REVIEW COVERSHEET FORM

LS-AA-104-1001

01/11/01

Station: Byron

Page 1 of 2

Activity/Document Number: ER 9919656

Revision Number: 0

Title: Temporary Freeze Seal for 2AF017A

Description of Activity:

ER 9809489 evaluates the installation of a temporary freeze seal on line 2SX25AA-6" for the replacement of valve 2AF017A. Line 2SX25AA-6" is the essential service water (SX) inlet supply line to the 2A auxiliary feedwater (AF) pump and 2A AF pump oil cooler (2AF01AA). The freeze seal will be used to isolate the section of piping to allow work on 2AF017A. The freeze seal will form an isolation boundary between the 14" supply header and valve 2AF017A. This activity is to be performed while Unit 2 is in Modes 4, 5, 6, or defueled. The 2A AF pump and related equipment will be removed from service during this activity. Contingency plans were available as part of the freeze seal evaluation in the event of a freeze seal failure.

Reason for Activity:

The temporary freeze seal will provide the ability to isolate the 2A AF components from the in-service portion of the SX system to allow for replacement of valve 2AF017A.

Effect of Activity:

The freeze jacket will be installed on an operable line while work is done for valve 2AF017A. This activity will isolate the SX supply to the 2A AF pump and 2A AF pump oil cooler. The activity will be performed while Unit 2 is in Modes 4, 5, 6 or defueled which has no effect on the 2A AF pump as it will be removed from service for the duration of the work activity and is not required to be operable in Modes 4, 5, 6, or defueled.

Summary of Conclusion for the Activities 50.59 Review:

This activity will be performed when the 2A AF pump and related equipment are removed from service in Modes 4, 5, 6, or defueled. The freeze seal will be installed using approved procedures and the freeze jacket weight has been evaluated and found acceptable. Contingency plans will be in place should the freeze seal fail. The temporary freeze seal does not have any impact on the results of the design basis evaluation discussed in the UFSAR. Additionally, the operation of plant equipment required to mitigate the consequences of design basis events is not degraded since the AF pump is not required to be operable when the activity is being performed. Therefore, the consequences of evaluated accidents or transients are not increased.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if multiple discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.	<u> </u>	Rev. <u> </u>
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.	<u> </u>	Rev. <u> </u>
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	<u>6H-01-0048</u>	Rev. <u>0</u>

50.59 REVIEW COVERSHEET FORM

Station: Byron

Activity/Document Number: ER 9920761

Revision Number: 0

Title: Freeze Seal for Line 0WSA5A-3"

Description of Activity:

The proposed activity will temporarily install a freeze seal on line 0WSA5A-3". The freeze seal will be used to isolate the section of piping to support EC79828, cutting and capping 0WSA5A-3" just upstream of support 1WS804031R. The freeze seal will form an isolation boundary between the 20" return header and support 1WS804031R. Line 0WSA5A-3" is the non-essential service water (WS) return line from primary sample cooler OPS18A. The primary sample cooler and related equipment will be removed from service during this activity. Approved contingency plans using procedure CC-AA-403 will be in place should the freeze seal fail.

Reason for Activity:

The temporary freeze seal will provide the ability to isolate line 0WSA5A-3" from the in-service portion of the 20-inch WS header to allow for cutting and capping upstream of line 0WSA5A-3".

Effect of activity:

The freeze jacket will be installed on an operable line while work is done for EC 79828 (cut and cap line). This activity will isolate the WS return header from primary sample cooler OPS18A. The primary sample cooler will be removed from service for the duration of the work activity.

Summary of Conclusion for the Activities 50.59 Review:

The installed freeze seal on line 0WSA5A-3" does not have any impact on the results of the design basis evaluation discussed in the UFSAR. Additionally, the operation of plant equipment required to mitigate the consequences of design basis events is not degraded. Therefore, the consequences of evaluated accidents or transients are not increased. The freeze seal will not adversely affect the piping system or equipment. The revised piping configuration seismic qualification with the freeze seal installed has been evaluated and is acceptable. Therefore, no new accidents or equipment failures are created as a result of the proposed activity.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.	Rev.	
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.	Rev.	
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	Rev.	<u>0</u>

6H-01-0065

50.59 REVIEW COVERSHEET FORM**Station:** Byron**Activity/Document Number:** ER 9918582**Revision Number:** 0**Title:** Freeze Seal for Line 0WSA4A-3"**Description of Activity:**

The proposed activity will temporarily install a freeze seal on line 0WSA4A-3". The freeze seal will be used to isolate the section of piping to support EC79828, cutting and capping 0WSA4A-3" just downstream of support 1WS804015R. Line 0WSA4A-3" is the non-essential service water (WS) supply line to primary sample cooler 0PS18A. The primary sample cooler and related equipment will be removed from service during this activity. Approved contingency plans using procedure CC-AA-403 will be in place should the freeze seal fail.

Reason for Activity:

The temporary freeze seal will provide the ability to isolate line 0WSA4A-3" from the in-service portion of the 20-inch WS header to allow for cutting and capping downstream of line 0WSA4A-3".

Effect of activity:

The freeze jacket will be installed on an operable line while work is done for EC 79828 (cut and cap line). This activity will isolate the WS return header from primary sample cooler 0PS18A. The primary sample cooler will be removed from service the duration of the work activity.

Summary of Conclusion for the Activities 50.59 Review:

The installed freeze seal on line 0WSA4A-3" does not have any impact on the results of the design basis evaluation discussed in the UFSAR. Additionally, the operation of plant equipment required to mitigate the consequences of design basis events is not degraded. Therefore, the consequences of evaluated accidents or transients are not increased. The freeze seal will not adversely affect the piping system or equipment. The revised piping configuration seismic qualification with the freeze seal installed has been evaluated and is acceptable. Therefore, no new accidents or equipment failures are created as a result of the proposed activity.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.	_____	Rev. _____
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.	_____	Rev. _____
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	6H-01-0066	Rev. 0

Fire Protection Report Draft Revision
Packages (FDRP)

1.	6G-00-0125
2.	6G-00-0139
3.	6G-00-0153
4.	6G-00-0155
5.	6H-00-0105
6.	6G-01-0004, Revision 1

Safety Evaluation Summary Form

Tracking No. 6G-00-0125
Activity No. FDRP 19-041

DESCRIPTION:

The proposed activity revises the Fire Protection Report (FPR) and the Byron Cold Shutdown Repair Cable Routing Report (CSRCRR) to eliminate the credited action to repair instrument loops associated with 1(2)PT-0403, 1(2)PT-0405, 1(2)TE-0604, and 1(2)TE-0605 for a design basis fire occurring in the main control room (MCR), auxiliary electric equipment rooms (AEER), and the mechanical penetration areas. In lieu of making these repairs, local indication located outside of the MCR will be credited. Additionally, operating procedures 1(2)BOA PRI-5 and BOP RH-6 will be revised to reference local indicators 1(2)PI-0402, 0404 for instances where reactor coolant system (RCS) wide range pressure loops 1(2)PT-0403 and 1(2)PT-0405 may be not available due to fire damage.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed changes do not increase the quantity or physical arrangement of combustible material within any fire zone, create or introduce additional ignition sources, or change fire detection or suppression capability in any area. The necessary manual actions to monitor residual heat removal (RH) shutdown cooling parameters from local indicators can be reasonably performed within the available time to achieve cold shutdown conditions (72 hours). The local indicators are located in accessible areas. The proposed activities do not manipulate or impact any plant equipment directly. The proposed activity will be implemented to assist the existing procedure for placing the RH system into the shutdown cooling function following a design basis fire. The manual actions that place RH cooling into operation are not changed by the proposed activity. Since the cold shutdown conditions are achieved, the consequences of a design basis fire have not changed.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity is only performed following a severe fire which has damaged the RCS wide range pressure and RH heat exchanger outlet temperature instrument loops. The proposed activity will not be performed during normal operation or shutdown or during any design basis accident (other than fire). The proposed activity sends an operator to read a local indicator located on the instrument rack on the containment floor (377' elevation outside missile barrier) or

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-00-0125
Activity No. FDRP 19-041

in the RH heat exchanger rooms. The activity cannot initiate an accident, transient, equipment failure or malfunction.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity has no impact on the bases of any Technical Specification. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6G-00-0139
Activity No. FDRP 19-048

DESCRIPTION:

The Byron responses to CMEB 9.5-1, Position C.4.d "Inspection" and Position C.4.i "Records" (Fire Protection Report (FPR) page 3.4-3 and 4), are being revised by adding clarifying information regarding the Quality Assurance program requirements applied to inspecting external conduit penetrations of fire-rated barriers and maintaining records of the work performed. Also an editorial change is made to FPR page 3.4-1 to add the missing section heading "3.4 Quality Assurance Program".

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity does not change the zone occupancy, fire detection capability, fire suppression capability, or combustible loading in the affected zones. In addition, this change is not adding any new ignition sources. Therefore, the proposed change does not affect the probability of a design basis fire. The proposed activity adds discussion about inspections of fire barriers and about how quality records are maintained. The inspections are visual inspections and do not physically alter the fire barrier or how any system is operated. The frequency the fire barriers are inspected or the inspection methods are not changed. The quality records have no impact on any fire barrier or system operation. Therefore, the fire barriers are not impacted by the proposed activity. With integrity of the fire barriers maintained during a design basis fire, there is no increase in the probability or consequence of malfunction of equipment important to safety.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity adds discussion about inspections of fire barriers and about how quality records are maintained. The inspections are visual and do not physically alter the fire barrier or how any system is operated. The quality records have no impact on any system operation. Therefore, the proposed activity does not affect plant operation. The proposed change does not alter the conclusions of the safe shutdown analysis. Therefore, the proposed activity does not create the possibility of an accident or malfunction of a different type.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-00-0139
Activity No. FDRP 19-048

The proposed activity has no impact on the bases of any Technical Specification. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-00-0153
Activity No. FDRP 19-049

DESCRIPTION:

The proposed change modifies the Fire Hazard Analysis (FHA) which is contained in Fire Protection Report (FPR) Section 2.3. The FHA is being revised to incorporate cumulative combustible loading value changes where more than one FPR change package affected the combustible loading within the zone. The scope of this evaluation does not include fire zones where only a single FPR change package affected combustible loading since those changes were individually evaluated in their applicable change packages.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The probability of a design basis fire is not increased because conditions likely to cause a fire (e. g., significant combustible material, uncontrolled ignition sources) have not been increased as a result of these changes. The current fire protection features are adequate for the hazards considered or postulated (e. g., fire detection, hose stations, fire extinguishers, fire brigade, fire barriers, non-combustible construction, low combustible loading). This change does not increase the consequences of a fire. The ability to achieve and maintain safe shutdown in the event of a fire is not adversely affected. The proposed change does not increase the probability of occurrence or consequence of a malfunction of equipment important to safety since a design basis fire already assumes the equipment within an affected fire zone is unavailable. The existing fire barriers remain effective to prevent the spread of fire from affecting equipment important to safety in adjacent zones.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The changed analyses demonstrate that the capability to safely shut down the plant using existing plant procedures has not been changed. Since the existing fire protection features are adequate to protect the increased hazard presented by the increased combustible fire load, the malfunctions assumed due to a design basis fire have not changed. The proposed change will not create any new equipment failures or malfunctions since a design basis fire already assumes the equipment within an affected fire zone is unavailable and the fire barriers separating adjacent fire zones are not adversely affected. Therefore, an accident or malfunction of a different type has not been created.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-00-0153
Activity No. FDRP 19-049

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity has no impact on the bases of any Technical Specification. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6G-00-0155
Activity No. FDRP 20-003

DESCRIPTION:

Fire Protection Report (FPR) Table 3-1 "NFPA Code Deviation Report" is being revised to add a new deviation from NFPA 13-1983. NFPA 13-1983, Section 3-14.1.2, requires that drain and test valves shall be of listed type of 175 psi cold water pressure rating. Contrary to this requirement, many valves installed at Byron are not UL listed. FPR Table 3-1 is revised to add a deviation that states this condition and to state that valves originally installed or subsequently replaced have been selected with a pressure rating of 200 lbs. WOG (Water, Oil, Gas) per Specification F-2817 piping design Table 083BB. This corresponds to a pressure rating of 400 psi for cold water, oil, or gas.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The probability of a design basis fire is based on the occupancy of the fire zone, associated fire hazards (combustibles exposed to potential ignition sources), and the fire protection detection and suppression systems provided to mitigate fires that originate within the zone. The proposed activity does not change the zone occupancy, fire detection capability, fire suppression capability, or combustible loading in the affected zones. The consequences of a fire are not affected because the FPR deviation does not affect the ability of the fire protection (FP) system to mitigate the consequences of a fire.

The probability of flooding in the auxiliary building is not increased by the proposed change because the 200 lb. WOG pressure rating (400 psi cold water) of the installed valves exceeds the maximum pressure rating of the FP system. The installed valves are normally closed valves and are only operated to drain the system or for inspector's testing. Under these restricted conditions, the FP system is isolated or supervised by Operating. The subject drain or test valves are one inch or less in size and are only operated when draining or testing the sprinkler system. Because of the limited potential leakrate of these small lines and their restricted use, there is no potential to cause significant flooding in the auxiliary building. The consequence of flooding in the auxiliary building is not increased by the proposed change because the FP system is not relied upon to mitigate the consequences of a flooding event.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-00-0155
Activity No. FDRP 20-003

The NFPA code deviation does not physically alter the fire suppression system or how any system is operated. Failure of the affected valves will not create a new type of accident or transient. The installed valves have a pressure rating that exceeds that specified by the NFPA code or UL. The installed valves have the same physical and functional features as the NFPA specified valves. Therefore, the change does not create the possibility of an accident, transient, or malfunction or a different type.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity has no impact on the bases of any Technical Specification. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-00-0105
Activity No. FDRP 19-039

DESCRIPTION:

The proposed activity evaluates the storage of lead shielding blankets inside containment at 426' elevation in the reactor head storage area between refueling outages B1R10 and B1R11. This activity adds combustible fire loading. FDRP 19-039 has been prepared to address this change. The Fire Protection Report (FPR) fire hazard analysis in Section 2.3 and combustible loading in FPR Table 2.2-3 is revised to reflect the added fire loading resulting from storage of the lead blankets on elevation 426' of the Unit 1 containment building. The changes to the FPR affect fire zone 1.3-1 which is described in Section 2.3.1.5 of the FPR.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The probability of a design basis fire or malfunction is not increased since the activity does not change the zone occupancy, ignition sources, fire detection, or fire suppression capability in the affected zone. The changes only add combustible loading to the zone. The consequences are not increased since the increased fire loading is still within combustible loading values considered to be "low" (less than 100,000 BTUs/square foot, ComEd Standard NES-MS-05.1).

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The design basis fire is assumed to affect the safe shutdown equipment within the zone of fire. The safe shutdown analysis demonstrates that safe shutdown can be achieved and maintained in the event of a design basis fire in any zone. The additional minor fire loading attributed to this change does not affect this conclusion, does not affect the currently evaluated design basis fire, and does not create a new type of accident.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Technical Specifications are not affected by the proposed change.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-01-0004 Revision 1
Activity No. FDRP 20-005

DESCRIPTION:

The proposed change modifies the description of administrative procedures that implement the Approved Fire Protection Program (AFPP) which is contained in Fire Protection Report (FPR) Sections 3.2, 3.3, 3.4, 3.6, A5.7 and Table 3-1. The FPR sections are modified to eliminate references to station administrative procedures that have been replaced by NGG common procedures and to correct statements that are no longer implemented in the specific manner described in the FPR.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed changes are corrections to the description of the administrative fire protection program. The proposed changes do not change administrative controls for minimizing permanent or transient fire loads or for controlling possible ignition sources. The design or operation of the fire detection or suppression systems is not changed and manual fire fighting capability is not affected. The adequacy of passive fire barriers is not impacted by the proposed change. The current fire protection features are adequate for the hazards considered or postulated (e.g., fire detection, hose stations, fire extinguishers, fire brigade, fire barriers, non-combustible construction, and low combustible loading) and have not been altered by the proposed changes. Therefore, the probability of occurrence or the consequence of an accident or a malfunction of equipment important to safety has not been increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed changes are corrections to the description of the administrative fire protection program. There is no change to plant equipment or how plant equipment is operated. The administrative changes do not affect the maintenance or availability of plant equipment. Therefore, the possibility of an accident or a malfunction of equipment important to safety of a different type has not been created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Technical Specifications are not impacted by the proposed activity.

<u>Procedure Changes</u>	
1.	6G-99-0017
2.	6G-99-0020
3.	6G-99-0023
4.	6G-99-0025
5.	6G-99-0037
6.	6G-99-0041
7.	6G-99-0073
8.	6G-99-0079
9.	6G-99-0082
10.	6G-99-0093
11.	6G-99-0096
12.	6G-99-0109
13.	6G-99-0117
14.	6G-99-0118
15.	6G-99-0126
16.	6G-99-0143
17.	6G-99-0151
18.	6G-99-0189
19.	6G-99-0207
20.	6G-99-0208
21.	6G-99-0235
22.	6G-99-0237
23.	6H-99-0012
24.	6H-99-0017
25.	6H-99-0031
26.	6H-99-0033
27.	6H-99-0034
28.	6H-99-0035
29.	6H-99-0047
30.	6H-99-0049
31.	6H-99-0053
32.	6H-99-0054
33.	6H-99-0055
34.	6H-99-0057
35.	6H-99-0058
36.	6H-99-0070
37.	6H-99-0074
38.	6H-99-0077
39.	6H-99-0081
40.	6H-99-0106
41.	6H-99-0109
42.	6H-99-0112
43.	6H-99-0115
44.	6H-99-0137
45.	6H-99-0144
46.	6H-99-0147

Procedure Changes (continued)	
47.	6H-99-0170
48.	6H-99-0183
49.	6H-99-0207
50.	6H-99-0211
51.	6H-99-0225
52.	6H-99-0234
53.	6H-99-0243
54.	6H-99-0253
55.	6H-99-0257
56.	6H-99-0274
57.	6H-99-0275
58.	6H-99-0276
59.	6H-99-0277
60.	6H-99-0278
61.	6H-99-0307
62.	6H-99-0317
63.	6H-99-0318
64.	6H-99-0322
65.	6H-99-0326
66.	6H-99-0333
67.	6H-99-0343
68.	6H-99-0344
69.	6H-99-0361
70.	6H-99-0392
71.	6H-99-0398
72.	6H-99-0407
73.	6H-99-0417
74.	6H-99-0421
75.	6G-00-0023, Revision 1
76.	6G-00-0165
77.	6H-00-0060
78.	6H-00-0084
79.	6H-00-0093
80.	6H-00-0096
81.	6H-00-0099
82.	6H-00-0107
83.	6H-00-0112
84.	6H-00-0123
85.	6H-00-0131
86.	6H-00-0133
87.	6H-00-0140
88.	6H-00-0141
89.	6H-00-0170
90.	6H-99-0174
91.	6H-99-0177
92.	6H-00-0189

<u>Procedure Changes (continued)</u>	
93.	6G-01-0011
94.	6G-01-0027
95.	6H-01-0002, Revision 1
96.	6H-01-0006
97.	6H-01-0007
98.	6H-01-0010
99.	6H-01-0030
100.	6H-01-0031
101.	6H-01-0046
102.	6H-01-0049
103.	6G-02-0005
104.	6G-02-0008
105.	6H-02-0001
106.	6H-02-0002
107.	6H-02-0008
108.	6H-02-0016
109.	6H-02-0025

Safety Evaluation Summary Form

Tracking No. 6G-99-0017

Activity No. NO-01, 04, 05, 07, 08, 09, 15, 25, 27, 34, 35, and 38; CWPI-NSP-TQ-1-12

DESCRIPTION:

The proposed activity is a revision of six Nuclear Oversight (N.O.) procedures (N.O.-1, 5, 15, 4, 8, and 27), deletion of four N.O. procedures (N.O.-7, 9, 25, and 34), and implementation of two N.O. procedures (N.O.-35 and 38). The proposed activity also implements a Common Work Practice Instruction (CWPI) CWPI-NSP-TQ-1-12.

The N.O. procedures were revised/initiated to reflect organizational changes and adjustments in processes. The underlying purpose and function of the processes reflected have not significantly changed. These changes reflect requirements of the QA Topical Report.

The CWPI procedure is administrative in nature and provides guidance for administering the training program for the N.O. department.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

No accidents or transients are affected. The proposed activity, as described above, does not have any affect on any previously analyzed consequences of any accident or transient. The proposed activity has no affect on equipment or the consequences of a malfunction of equipment. The subject procedures are administrative in nature.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

Plant operation is not affected. Systems, structures, or components are not affected. The proposed activity has no effect on equipment failures. The subject procedures are administrative in nature.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are affected. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0020Activity No. BAP 1100-3DESCRIPTION:

The proposed procedure changes involve the exemption of the requirement to process plant barrier impairment (PBI) paperwork (i.e., BAP 1100-3T1) for doors that do not involve ventilation, HELB or flood requirements. It also covers exemption of auxiliary building ventilation (VA) access doors/panels. This exemption is only applicable provided the appropriate actions, as delineated in BAP 1100-3, are complied with. These actions involve continuous attendance at the barrier to ensure that the most limiting Technical Requirements Manual (TRM) Action Requirement (continuous fire watch) and/or compensatory security measures are in place, and/or the system is either isolated in accordance with an approved procedure or removed from service (VA access doors). The change also provides guidance on when a 50.59 is required for compensatory actions. This 50.59 also covers the determination of the various door review disciplines as delineated in BAP 1100-3A3, Door Matrix.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The probability and consequences of an accident are not increased by the changes made in these procedures. These procedures ensure that any barrier which can affect accident consequences either, a) receives a full review of the impact on operability of essential equipment, or b) has been pre-reviewed for impact on operability of essential equipment. In either case, appropriate compensatory actions will continue to be required to maintain the plant within its design basis. Therefore, there can be no increase in the probability of an accident. Criteria in the procedure effectively determine whether a safety evaluation is required. Specifically, if personnel are expected to perform actions to compensate for a degraded barrier they must be dedicated to the action (no other duties), equipment must be readily available, and the action must be capable of being performed before the barrier is challenged. Other applications of compensatory actions required to meet design basis will receive a 50.59 safety evaluation (or screening). Therefore, the probability and the consequences of accidents is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

This procedure provides for a review of the impact of barrier degradation on systems and functions to ensure that the plant is maintained within the design basis as evaluated in the safety analysis report (SAR). This change is

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Safety Evaluation Summary Form

Tracking No. 6G-99-0020Activity No. BAP 1100-3

administrative in nature, reducing the paperwork burden on the working groups. All required regulatory actions will continue to be performed. The working groups are still required to ensure that the appropriate watch/isolation/out of service is provided before impairing the door. If personnel are expected to perform actions to compensate for a degraded barrier they must be dedicated to the action (no other duties), equipment must be readily available, and the action must be capable of being performed before the barrier is challenged. Other applications of compensatory actions required to meet design basis will receive a 50.59 safety evaluation (or screening). Because the appropriate regulatory actions are still required to be performed, there is no possibility of the occurrence of an accident or malfunction of a type different than those evaluated in the SAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are affected by this procedure change. All required regulatory actions are still required to be completed.

Safety Evaluation Summary Form

Tracking No. 6G-99-0023
Activity No. 1BVSR 7.5.4-1 and 2BVSR 7.5.4-1

DESCRIPTION:

The purpose of this procedure change was to incorporate the assumed logic times for the actuation signals of the auxiliary feedwater (AF) system into both 1/2BVSR 3.1.15-1 and 1/2BVSR 7.5.4-1. Therefore, the 2 seconds for these logic times can be removed from 1/2BVSR 7.5.4-1. In effect the 2 seconds for the assumed logic time have been incorporated in both surveillances when it is required only to have them included in one.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The activity does not increase the probability of an accident or malfunction of equipment important to safety than any previously evaluated in the safety analysis. The assumed logic times for the actuation signals of the auxiliary feedwater (AF) system have been incorporated into both 1/2BVSR 3.1.15-1 and 1/2BVSR 7.5.4-1. Therefore, the 2 seconds for these logic times can be removed from 1/2BVSR 7.5.4-1. In effect the 2 seconds for the assumed logic time have been incorporated in both surveillances when it is required only to have them included in one. The primary reason to install a stroke time to the 1/2AF004A/B valves is to allow tracking for potential repair or preventative maintenance. The valves are passive normally open valves that receive an ESF signal when closed during a safety injection (SI), reactor coolant pump (RCP) bus undervoltage, or steam generator (SG) low-2 signal. The 1/2AF004A/B valves are ISI valves that are tracked for indication only. The UFSAR required response time for the AF system is 60 seconds. 1/2BVSR 3.1.15-1 encapsulates the 2 seconds for the assumed logic times in a 5.7 second factor that requires AF to be operational at 54.3 seconds per the surveillance. This change removes the duplication of an assumed response time from UFSAR Section 7.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The activity does not create the possibility of an accident or transient of a different type than any previously evaluated. The assumed logic times for the actuation signals of the AF system have been incorporated into both 1/2BVSR 3.1.15-1 and 1/2BVSR 7.5.4-1. Therefore, the 2 seconds for these logic times can be removed from 1/2BVSR 7.5.4-1. In effect the 2 seconds for the assumed logic time have been incorporated in both surveillances when it is required only to have them included in one. The primary reason to install a stroke time to the 1/2AF004A/B valves is to allow tracking for potential repair or preventative maintenance. The

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Safety Evaluation Summary Form

Tracking No. 6G-99-0023
Activity No. 1BVSR 7.5.4-1 and 2BVSR 7.5.4-1

valves are passive normally open valves that receive an ESF signal when closed during a SI, RCP bus undervoltage, or SG low-2 signal. The 1/2AF004A/B valves are ISI valves that are tracked for indication only. The UFSAR required response time for the AF system is 60 seconds. 1/2BVSR 3.1.15-1 encapsulates the 2 seconds for the assumed logic times in a 5.7 second factor that requires AF to be operational at 54.3 seconds per the surveillance. This change removes the duplication of an assumed response time from the UFSAR Section 7.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The activity does not reduce the margin of safety as described in the basis for any technical specification. The assumed logic times for the actuation signals of the AF system have been incorporated into both 1/2BVSR 3.1.15-1 and 1/2BVSR 7.5.4-1. The primary reason to install a stroke time to the 1/2AF004A/B valves is to allow tracking for potential repair or preventative maintenance. The valves are passive normally open valves that receive an ESF signal when closed during a SI, RCP bus undervoltage, or SG low-2 circuit. The 1/2AF004A/B valves are ISI valves that are tracked for indication only. The AF system is considered inoperable when the 1/2AF004A/B valves are closed. Since the AF system is considered inoperable during the surveillance, no Technical Specification margin to safety is reduced. The UFSAR required response time for the AF system is 60 seconds. 1/2BVSR 3.1.15-1 encapsulates the 2 seconds for the assumed logic times in a 5.7 second factor that requires AF to be operational at 54.3 seconds per the surveillance. This change removes the duplication of an assumed response time.

Safety Evaluation Summary Form

Tracking No. 6G-99-0025
Activity No. BOP CV-29a and BOP CV-29b

DESCRIPTION:

These procedures are being written to provide permanent procedures to allow operation of the centrifugal charging (CV) pumps on mini-flow recirculation to the volume control tank. Operating the system in this configuration will support activities including system flushes, system/pump troubleshooting, and post maintenance testing. The system lineup will be similar to the quarterly ASME pump run under ASME Section XI requirements.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

A prerequisite step in the procedures verifies the system status is such that this procedure can be performed. In addition, adequate procedural controls exist to protect the centrifugal charging (CV) pump in the event of a loss of miniflow recirculation capability with the discharge valve closed. Accident analyses require only one CV pump to provide high head safety injection and the required high head injection capability of the CV pump is verified to be available for the applicable mode prior to execution of this procedure. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The CV pump will be considered inoperable during the performance of this procedure. Adequate cautions and instructions exist in the procedures to secure the CV pump or open the discharge valve in the unlikely event that the miniflow valves would automatically close due to a safety injection signal. The loss of one train to provide high head injection does not create the possibility for an accident or malfunction of a different type since the accident analyses conservatively assume a failure of one intermediate safety injection (SI) pump and one CV pump.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The CV pump will be considered inoperable during the performance of these procedures. The loss of the capability of one train to provide high head injection does not reduce the margin of safety of an accident previously evaluated or as

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Safety Evaluation Summary Form

Tracking No. 6G-99-0025
Activity No. BOP CV-29a and BOP CV-29b

defined in the basis for any Technical Specification since the accident analyses conservatively assume a failure of one intermediate SI pump and one CV pump.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0037Activity No. BAP 100-27DESCRIPTION:

BAP 100-27, Equipment in Use is being written to replace Site Policy Memo 600-11, Equipment in Use Tags, Revision 5, in response to the 1997 WANO Peer Evaluation, finding ES.3-1, which concerned equipment intended for temporary use being installed in the plant for long periods without appropriate reviews for impact on plant design criteria. BAP 100-27 provides direction for the identification of Equipment in Use (EIU) via the hanging of Equipment in Use tags on the equipment. The procedure provides direction when equipment requires an EIU tag, in accordance with NSWP-A-21.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

This procedure simply describes how equipment installed in the field should be identified. Equipment considered to be temporary modifications will be installed in accordance with NSWP-A-21 or another appropriately reviewed and approved procedure. Therefore, this procedure will not increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

This procedure simply describes how equipment installed in the field should be identified. Equipment considered to be temporary modifications will be installed in accordance with NSWP-A-21 or another appropriately reviewed and approved procedure. Therefore, this procedure will not create the possibility of an accident or transient of a different type than those previously evaluated.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

This procedure simply describes how equipment installed in the field should be identified. Equipment considered to be temporary modifications will be installed in accordance with NSWP-A-21 or another appropriately reviewed and approved procedure. Therefore, this procedure will not reduce the margin of safety as described in the basis for any Technical Specification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0041
Activity No. NO-08, 35, 38, 03, 31, and 41

DESCRIPTION:

The proposed activity is a revision of three Nuclear Oversight (N.O.) procedures, deletion of one N.O. procedure, and implementation of two N.O. procedures. A discussion of the details for each procedure change is provided below.

Revisions

N.O.-08, Revision 4, Use of Field Monitoring Program. This procedure is administrative in nature and established the requirements, responsibilities, and methods for the implementation of the Field Monitoring Program as administered by N.O.

Revision 4 changes include restricting applicability of the procedure to Zion Station Nuclear Oversight. Field observations by Nuclear Oversight at the other stations will now be covered under N.O.-31, Revision 0, Field Observation Program.

N.O.-35, Revision 1, Continuous Assessment Process. This procedure is administrative in nature and provides direction for the planning, scheduling, preparation, performance and reporting of N.O. continuous assessments and follow-up of identified items. This process meets the Quality Assurance Topical Report and NQA-1 requirements for QA audits. Revision 1 involves minor administrative changes. Intent of the procedure is unaffected by this revision.

N.O.-38, Revision 1, Master Audit Plan. This procedure is administrative in nature and provides the basis for performing N.O. continuous assessments. The procedure contains attributes that are to be assessed on a performance based and periodic frequency. Revision 1 changes include clarification of terminology in the Work Management section to provide additional guidance for evaluation of the Work Control system.

Deletions

Cancellation of N.O.-03, Revision 0, ISEG Description of Duties. This procedure was administrative in nature and had provided guidance to perform the ISEG function. Recently implemented revision 66a of the QA Topical Report (Section 1, Article 3.4.1.3.2.9) provides appropriate guidance to perform ISEG function without an additional implementing procedure. For this reason, N.O.-03, Revision 0, is being cancelled.

Safety Evaluation Summary Form

Tracking No. 6G-99-0041
Activity No. NO-08, 35, 38, 03, 31, and 41

Implementations

N.O.-31, Revision 0, Field Observation (FO) Program. This procedure is administrative in nature and established requirements, responsibilities, and methods for implementation of the Field Observation Program in support of the Continuous Assessment Process. It includes provisions for documenting and reporting the results of Field Observations, the use of observation results for trending or scheduling future reviews, and an integrated observation documentation system for the Assessment and Independent Safety Engineering Group (ISEG) functions.

N.O.-41, Revision 0, N.O. Issue Escalation. This procedure is administrative in nature and establishes the process for formally escalating issues through the executive management chain by N.O. Issues are escalated when N.O. determines that the issues are not being adequately addressed by a line organization. The procedure applies to issues identified by N.O. that develop from quality-related nuclear activities and processes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

No accidents or transients are affected. The proposed activity, as described above, does not have any affect on any previously analyzed consequences of any accident or transient. The proposed activity has no affect on equipment or the consequences of a malfunction of equipment. The subject procedures are administrative in nature.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

Plant operation is not affected. Systems, structures, or components are not affected. The proposed activity has no effect on equipment failures. The subject procedures are administrative in nature.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are affected. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0073
Activity No. NSP-MS-2000 Revision 1

DESCRIPTION:

The proposed activity implements ComEd Corporate Procedure NSP-MS-2000 Revision 1, titled "Materials and Services, Roles and Responsibilities" at Byron.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity is an administrative function of a corporate procedure implementation at Byron. The procedure defines the roles and responsibilities of the Material/Supply Management organization and has no affect on any plant systems, structures, or components. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity has no impact on any safety analysis report documents. Defining the roles and responsibilities of the Material/Supply Management organization will not create the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The implementation of a procedure that defines the roles and responsibilities of the individuals in Materials Management is not part of the Technical Specifications. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0079
Activity No. 1BVSR AF-3

DESCRIPTION:

The proposed activity adds pertinent documentation for ISI/IST check valve testing. This change is being enacted to include this documentation in 1BVSR AF-3. This included documentation for the partial stroke test requirements for 1AF001A, 1AF001B, 1AF003A, 1AF003B, 1AF029A, 1AF029B and 1AF014A-H.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

This change is being enacted to include documentation of the ISI/IST check valve testing in 1BVSR AF-3. This is a passive addition to an already existing procedure. This includes documentation for the partial stroke test requirements for 1AF001A, 1AF001B, 1AF003A, 1AF003B, 1AF029A, 1AF029B and 1AF014A-H. There is no change to the operation of the auxiliary feedwater (AF) system; therefore, the activity does not increase the consequences of any accident or transient than previously evaluated in the safety analysis report.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The activity does not create any new equipment failures or malfunctions. This change is being enacted to include documentation of the ISI/IST check valve testing in 1BVSR AF-3. This is a passive addition to an already existing procedure. This includes documentation for the partial stroke test requirements for 1AF001A, 1AF001B, 1AF003A, 1AF003B, 1AF029A, 1AF029B and 1AF014A-H. Therefore, the activity does not create any new equipment failures or malfunctions because there is no change to the operation of the AF system. The possibility for an accident or malfunction of a different type than those evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

This change is being enacted to include documentation of the ISI/IST check valve testing in 1BVSR AF-3. This includes documentation for the partial stroke test requirements for 1AF001A, 1AF001B, 1AF003A, 1AF003B, 1AF029A, 1AF029B and 1AF014A-H. The operation of the AF system is not changed; therefore, the margin to safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0082
Activity No. 2BOSR 3.6.5-615B Revision 1 Temporary Change

DESCRIPTION:

The proposed activity is a surveillance procedure temporary change to install and later remove jumpers across test switch S841, at panel 2PA12J, in the event S841 fails to operate correctly. Test switch S841 has experienced an intermittent failure to operate correctly during slave relay testing. New steps will be added to remove the jumpers both after the slave relay energizes and in the Emergency Exit section. Slave relay K622 operates to close containment mini purge valves 2VQ004B/5B and containment post LOCA purge filter unit valve 2VQ003. The jumpers will serve the same function as the test switch internal components. The installation of the jumpers will not prevent or interfere with operation of the slave relay or ESFAS to perform their safety function. The jumpers will be installed only if the test lamp and/or the slave relay fail to energize in their individual steps. The ESFAS system test circuit will be returned to a normal alignment, no jumpers installed, upon completion of the surveillance.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The ESFAS test circuit does not control plant parameters and thus is not an initiator of any accident or transient. The test circuit only verifies ESFAS components will perform their functions when required. The jumper will perform the same function as the test switch internal components. Slave relay K622 operates to close containment ventilation valves 2VQ004B, 2VQ005B and 2VQ003. Closure of the containment ventilation valves minimizes release of radioactivity in the event of an accident. The purpose and function of the slave relay is not altered by the installation of the jumpers. The slave relay will receive the same voltage with the jumpers installed as with the test switch operating correctly. Installation of the jumpers will not prevent the slave relay from performing its safety function in the event of an accident or transient and thus the consequences remain unchanged.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The ESFAS test circuit does not control plant parameters and thus is not the initiator of any accident or transient. The test circuit has no affect on the normal operation of the slave relay in the event of an accident or transient. The function and output of the test circuit is not changed by installation of the jumpers on the test switch. The function and operation of the slave relay are not changed by installation of the jumpers on the test switch. Insulated jumpers will minimize

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Safety Evaluation Summary Form

Tracking No. 6G-99-0082Activity No. 2BOSR 3.6.5-615B Revision 1 Temporary Change

interference with other components in the cabinet. A drawing identifying the proper test switch contacts will be temporarily added to the procedure to ensure the jumpers are installed on the correct contacts. The jumpers will perform the same function as the test switch.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The Technical Specification requirement to test the slave relay is not affected by installation of the jumpers. The function of the test circuit is not changed. The voltage to the slave relay will be the same with the jumpers installed or the test switch operating correctly. Temporary installation of jumpers across test switch S841 will not prevent slave relay K622 from operating to close its assigned valves in the event of an ESFAS actuation.

Safety Evaluation Summary Form

Tracking No. 6G-99-0093
Activity No. 0BVSR SX-8 Revision 0

DESCRIPTION:

The proposed activity implements a procedure to provide a method to measure essential service water (SX) blowdown flow.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The testing will not affect any accident or transient initiators. The SX system will not be placed in an abnormal condition and will be operated in accordance with approved procedures. SX supply header pressure will remain above the low alarm setpoint which is where the system flow balance is performed. This assures adequate flow will be available to all SX serviced components in the event of a transient or accident. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The testing will not affect any transient or accident initiators. The SX system will not be placed in an abnormal condition and will be operated in accordance with approved procedures. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The surveillance activity does not impact any Technical Specification requirements.

Safety Evaluation Summary Form

Tracking No. 6G-99-0096Activity No. Temporary Change to 2BOSR 3.2.7-630A Revision 1,
2BOSR 3.2.7-637A Revision 1, and 2BOSR 3.2.7-638A Revision 1DESCRIPTION:

The following temporary changes apply to the referenced procedures:

- 1) Feedwater isolation (FWI) signals to close 2FW009D are normally verified by test lights without valve operation. Temporary change: The FWI signal to close 2FW009D will be verified by measuring the resistance across FWI relay FWI3A at a terminal strip inside 2PM06J or fuse contacts inside 2DC10J. The resistance measurement will require de-energizing the final device actuation circuit by pulling power supply fuses which will prevent a Train A closure signal to 2FW009D.
- 2) FWI signals to close 2FW520A are normally verified by voltage measurements at FWI relay FWI1A. Temporary change: The FWI signals to close 2FW520A will be verified by a resistance measurement at FWI relay FWI1A. The resistance check will require lifting terminal leads during the resistance measurement.

Existing steps will be deleted/revised and new steps/notes will be added to accomplish the temporary change. Slave relays K630, K637 and K638 generate a Feedwater Isolation signal from Reactor Trip (P-4), High Steam Generator level or Safety Injection signal. The power supply fuses will be installed and the lifted wires connected following completion of the applicable steps or in the Emergency Exit section, whichever occurs first.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The ESFAS test circuit does not control plant parameters and thus is not an initiator of any accident/transient or malfunction of equipment important to safety. The test circuit only verifies ESFAS components will perform their functions when required. During the FWI slave relay tests, the Train A final actuation solenoid is not available for 2FW009D operation due to the reduced voltage of the test circuit. The temporary change will have the same effect. 2FW009D will be declared inoperable. The Train B redundant device associated with the protection train not under test will be available in the event protection action is required to close 2FW009D.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0096Activity No. Temporary Change to 2BOSR 3.2.7-630A Revision 1,
2BOSR 3.2.7-637A Revision 1, and 2BOSR 3.2.7-638A Revision 1

The ESFAS test circuit does not control plant parameters and thus is not an initiator of any accident/transient or malfunction of equipment important to safety. The test circuit only verifies ESFAS components will perform their functions when required. During the FWI slave relay tests, the Train A final actuation solenoid is not available for 2FW009D operation due to the reduced voltage of the test circuit. The temporary change will have the same affect. The Train B redundant device associated with the protection train not under test will be available in the event protection action is required to close 2FW009D.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The Technical Specification requirement to test the slave relay is not affected by the temporary change. During the normal performance of the surveillance, the Train A final actuation device is not available to close 2FW009D. The temporary change does not reduce the level of protection beyond that already lost by use of the test circuit. 2FW009D is declared inoperable during the time the power is removed from the final actuation device circuit. Interlocking between trains is provided to prevent continuity testing in both trains simultaneously, therefore, the Train B redundant device associated with the protection train not under test will be available in the event protection action is required to close 2FW009D.

Safety Evaluation Summary Form

Tracking No. 6G-99-0109
Activity No. NO-14, 31, 42, 43, 44, 45, 46, 04, and 30

DESCRIPTION:

The proposed activity is revision of two Nuclear Oversight (N.O.) procedures, deletion of two N.O. procedures, and implementation of five N.O. procedures. The procedure numbers are listed and categorized below. A discussion of the details for each procedure change is provided below.

Revisions

N.O.-14, Revision 5, Supplier Qualification Activities. This procedure is administrative in nature and describes the Supplier Evaluation Services (SES) process for the evaluation of suppliers, which includes audits, surveys, source surveillances, annual evaluations, and maintenance of the Quality Approved Bidders List (QABL). This procedure applies to Nuclear Generating Group personnel responsible for the oversight of supplier activities, including maintenance of the QABL. The procedure is being reviewed at the Site to assess for impact on the Site. The process described by the procedure is conducted by the corporate office. Revision 5 changes include editorial/format changes for clarity, revision of the process for annual supplier evaluations, upgrade references from NTS to Action Tracking, clarification of ASME program requirements, clarified review frequency of audit/survey schedule, and clarified requirements for qualification of audit personnel.

N.O.-31, Revision 1, Field Observation (FO) Program. This procedure is administrative in nature and establishes requirements, responsibilities, and methods for implementation of the FO Program in support of the Continuous Assessment Process. It includes provisions for documenting and reporting the results of FOs, the use of observation results for trending or scheduling future reviews, and an integrated observation documentation system for the Assessment and Independent Safety Engineering Group (ISEG) functions. Revision 1 changes include removal of references to Action Tracking, removal of the FO load form, and various editorial changes for clarity. The procedure continues to implement the requirements of the QA Topical Report.

Deletions

Cancellation of N.O.-04, Revision 5, Training, Qualification and Certification of Nuclear Oversight Personnel. This procedure was administrative in nature and had established requirements for the training, qualification, and certification of N.O. personnel. N.O.-04 is being replaced by new procedures N.O.-42, 43, 44, 45, and 46. These procedures continue to carry out the function of training, qualification, and certification of N.O. personnel. These new procedures simplify and separate out multiple processes previously described in N.O.-04 to individual implementing procedures. These new procedures continue to implement the requirements of the QA Topical Report.

Cancellation of N.O.-30, Revision 0, Training, Qualification, and Certification of Supplier Evaluation Services Personnel. This procedure was administrative in nature and had established the requirements for personnel orientation, indoctrination, training, initial and

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Safety Evaluation Summary Form

Tracking No. 6G-99-0109Activity No. NO-14, 31, 42, 43, 44, 45, 46, 04, and 30

continued qualification, and certification for personnel performing evaluation of Supplier Services. It is replaced by new procedures N.O.-42, 43, 44, and 46, which continue to carry out the function of training, qualification, and certification of personnel conducting evaluation of Supplier Services. The evaluation of Supplier Services is conducted by the corporate office.

Implementations

N.O.-42, Revision 0, Nuclear Oversight Orientation. This procedure is administrative in nature and establishes the guidance for orienting N.O. personnel and quality assurance auditors per the requirements of ASME NQA-1. N.O.-42 simplifies and carries out the orientation process that had been described in procedure N.O.-04. This new procedure continues to implement the requirements of the QA Topical Report.

N.O.-43, Revision 0, Independent Safety Engineer Qualification. This procedure is administrative in nature and establishes the guidance for qualifying ComEd Nuclear Oversight personnel as Independent Safety Engineers. N.O.-43 simplifies and carries out the qualification process for members of the Independent Safety Engineering Group (ISEG) that had been described in procedure N.O.-4. This new procedure continues to implement the requirements of the QA Topical Report.

N.O.-44, Revision 0, Nuclear Oversight Lead Auditor Certification. This procedure is administrative in nature and establishes the requirements for the certification of ComEd Quality Assurance Lead Auditors, in accordance with ASME NQA-1. N.O.-44 simplifies and carries out the lead auditor certification process that had been described in procedure N.O.-04. This new procedure continues to implement the requirements of the QA Topical Report.

N.O.-45, Revision 0, Independent Inspector Qualification and Certification. This procedure is administrative in nature and specifies the methods for developing, documenting, and maintaining the qualification and certification of ComEd Independent Inspectors performing acceptance inspections, tests or examinations. N.O.-45 transfers the processes that had been described in NSWP-QC-01, NSQCP-1, and NSPQC-2 to this procedure. This new procedure continues to implement the requirements of the QA Topical Report.

N.O.-46, Revision 0, Technical Specialist Orientation and Indoctrination. This procedure is administrative in nature and provides guidance for orienting and indoctrinating Technical Specialists or other management personnel who participate on a ComEd Audit, Continuous Assessment, or Survey team. N.O.-46 simplifies and carries out the Technical Specialist orientation and indoctrination process that had been described in procedure N.O.-04. This new procedure continues to implement the requirements of the QA Topical Report.

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Safety Evaluation Summary Form

Tracking No. 6G-99-0109Activity No. NO-14, 31, 42, 43, 44, 45, 46, 04, and 30**SAFETY EVALUATION SUMMARY:**

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

No accidents or transients are affected. The proposed activity, as described above, does not have any effect on any previously analyzed consequences of any accident or transient. The proposed activity has no effect on equipment or the consequences of a malfunction of equipment. The subject procedures are administrative in nature.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

Plant operation is not affected. Systems, structures, or components are not affected. The proposed activity has no effect on equipment failures. The subject procedures are administrative in nature.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are affected. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6G-99-0117Activity No. Operating Technical Specification Action Requirement Procedures (BOLs)DESCRIPTION:

The proposed activity evaluates procedure changes that incorporate the revised station methodology with respect to Limiting Condition for Operations (LCO) 3.0.6. When Byron Station initially implemented TS Amendment 106 Improved Technical Specifications (ITS), the station methodology regarding LCO 3.0.6 was prescribed in TRM Appendix O - Safety Function Determination Program (SFDP) and did not take complete advantage of the allowances made by the TS. For example, when a SUPPORTED SYSTEM LCO was not met solely due to a SUPPORT SYSTEM LCO not being met, the station took the more restrictive position that the SUPPORTED SYSTEM LCO would still be entered, but entry would be delayed by the completion time allowed for the SUPPORT SYSTEM. Subsequent to ITS implementation, Byron Station reviewed and revised the methodology for applying LCO 3.0.6 to preclude any entry into SUPPORTED SYSTEM LCO, provided no loss of safety function exists. Revision 2 was made to TRM Appendix O and provides the maximum flexibility to the station allowed by the TS LCO 3.0.6. This evaluation supports changes to Byron Station procedures (i.e., BOLs) that apply the revised methodology for calculating delayed LCOAR entry for a single SUPPORT SYSTEM inoperability.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

No accidents are applicable; therefore, the consequences of an accident or the probability of occurrence of an accident will not increase. This proposed change is to the station's methodology for implementing the allowances of Technical Specification LCO 3.0.6 as amended by Amendment 106.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

This proposed change is to the station's methodology for implementing the allowances to Technical Specification LCO 3.0.6 as amended by Amendment 106. Changing the methodology will not create the possibility of an accident or transient.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed change implements TS LCO 3.0.6 exactly as written and approved in Amendment 106.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0118
Activity No. BOP SA-10 Revision 1

DESCRIPTION:

The proposed activity evaluates a revision to Byron Operating Procedure BOP SA-10 to install a temporary air compressor at the vendor tap connections just upstream of valves 0SA278 or 2SA183A. A temporary air compressor is being installed to support work which makes a station air compressor unavailable. The temporary air compressor is used either as a standby backup to station air compressors or to supply the compressed air to the plant air systems. The changes to the procedure are to meet administrative requirements of procedure NSWP A-21 for procedure adherence regarding system, structure, or component changes that would qualify as temporary modifications (TMODs) but are controlled in approved procedures.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The temporary hoses will not change the instrument air (IA) design in a way that the system will not fail into a safe state or a state demonstrated to be acceptable on some other defined basis if conditions such as loss of system integrity is experienced. The temporary hose and associated fittings are rated to a design temperature and pressure which exceeds the system piping. Therefore, it is expected that the temporary hose will provide the same degree of reliability as the permanent piping.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activities do not affect the existing failure modes of the IA system. A failure of this system will not prevent safety-related components from performing as required under accident conditions. All air-operated equipment is designed for a fail-safe mode on loss of instrument air and does not require a continuous air supply under emergency or abnormal conditions. The IA system has no functions necessary for achieving safe reactor shutdown or for accident prevention or mitigation.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No new accidents are created as a result of the proposed activities. Total failure of the proposed activities would result in a loss of IA to the IA users, which would result in all equipment important to safety which utilizes IA to fail to their fail-safe

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Tracking No. 6G-99-0118
Activity No. BOP SA-10 Revision 1

positions. This type of malfunction is identical to a failure of the system piping, which would result in the same results as the failure of the temporary equipment. Therefore, the margin of safety is not reduced.

Safety Evaluation Summary Form

Tracking No. 6G-99-0126
Activity No. BVP 900-16 and BVP 900-17

DESCRIPTION:

The proposed activity implements new procedures to perform a seat leakage test on emergency core cooling system (ECCS) check valves.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

Opening a flow path from the upstream side of the 1/2SI8948A/B/C/D ECCS check valves into the associated safety injection (SI) accumulator, aligning the SI test line to direct leakage past ECCS check valves, or pressurizing the downstream side of the 1/2SI8956A/B/C/D ECCS check valves via the SI pumps does not initiate or alter the initial conditions of any affected accident. Therefore, the probability of occurrence of any accident or transient is not increased

Normally closed containment isolation (CI) valves 1/2SI8888, 1/2SI8964, and 1/2SI8871 will be opened during the execution of the proposed activity. These CI valves will remain available and capable of closing within 10 seconds of receipt of a CI signal as required by Technical Specifications Table B 3.6.3-1. Closure within 10 seconds ensures that SI flow to the reactor coolant system (RCS) is available from the SI pump as required. The proposed activity does not adversely affect any boundary to radioactive release. The consequences of any accident are not increased.

The test pressures utilized by the proposed activity are within the design pressure of the affected piping. The SI accumulators will be isolated from the test pressures by a combination of closed SI test line isolation valves and ECCS check valves, only minimal ECCS check valve seat leakage will be allowed to enter the SI accumulators. Sufficient differential pressure will be maintained across the SI accumulator discharge check valves (when determining their seat leakage rates) to ensure the check valves remain closed and provide isolation from the RCS. Seat leakage testing of the ECCS check valves will aid in their ability to perform their design function. No other safety system or equipment is affected by the performance of the proposed activity. The probability of safety equipment malfunction is not increased as a result of the proposed activity.

Operation of the SI system will remain within the requirements of the Technical Specifications. ECCS check valve seat leakage testing will aid in the ability to mitigate safety equipment malfunctions by ensuring their pressure boundary isolation integrity. The affected CI valves will remain available and capable of

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Tracking No. 6G-99-0126
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closing within 10 seconds of receipt of a CI signal as required by Technical Specifications Table B 3.6.3-1. Closure within 10 seconds ensures that SI flow to the RCS is available from the 1A SI pump, as required. No other safety system or equipment is affected by the proposed activity. The consequences of a safety equipment malfunction are not increased as a result of the proposed activity.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

Operation of the SI system will remain within the requirements of the Technical Specifications. All affected components will remain operable for any ECCS actuation within the bounds of Technical Specification action statements. Plant operation is maintained within design bases. The ECCS check valve seat leakage testing of the proposed activity will aid the ability of the check valves to satisfy their design functions. CI valves will remain available and capable of closing upon receipt of a CI signal. No new failure modes are introduced. The possibility of a new accident or transient or the possibility of a new malfunction of equipment important to safety is not created by the proposed activity.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity ensures operations are performed within the requirements of the Technical Specifications. The Technical Specification requirements for the proposed activity are the same as the Technical Specification requirements for the routinely performed ECCS check valve leakage surveillance performed during each refueling outage. Based on the adherence to Technical Specification requirements, the margin of safety is not reduced.

Safety Evaluation Summary Form

Tracking No. 6G-99-0143
Activity No. NSP CC-AA-0401 Revision 0

DESCRIPTION:

The proposed activity implements NSP CC-AA-401 Revision 0 at Byron Station which provides a method for the installation and control of temporary lead shielding on structures, systems, or components (SSC) to achieve a reduction in personnel radiation exposure. In addition, guidelines are provided for the use of water shields, frisker booths, and shielding structures. It is applicable to both operational and non-operational piping systems. For non-operational piping systems, pre-evaluated shielding criteria and provisions have been established to determine the acceptable shielding weight on the affected piping. These criteria are provided in Section 1.1.1, Section 5 and Tables 8.1. This evaluation supports shielding installed within these criteria and the procedure allows this shielding to be installed without further Engineering or 50.59 review. Shielding installed outside these criteria or installed on operational piping require detailed Engineering review and an evaluation or screening under 10CFR 50.59.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

NSP CC-AA-401 Revision 0 is applicable to the installation of shielding on both operable and inoperable equipment. For inoperable equipment (Section 1.1.1), the installation criteria of Section 5 and Table 8.1 ensure that shielding installed without specific Engineering review does not impose loads greater than the dead weight load limit or adversely impact operational piping. Shielding installed outside the criteria of Section 5 or Table 8.1, or installed on operational piping (Section 1.1.2) requires detailed Engineering review and an evaluation or screening under 10CFR50.59. The Engineering review will ensure that installation of lead shielding under these circumstances is only performed within the design load criteria of the affected system, structure, or component (SSC), including safe shutdown earthquake requirements if applicable. For conditions that result in a loss of structural integrity, the actions of Technical Requirements Manual (TRM) Section 3.4 are applicable. Since shielding installed under this procedure either meets acceptable pre-reviewed criteria or meets a detailed Engineering review to ensure applicable design load criteria are met, the probability of occurrence of any accident or transient is not increased.

The installation of lead shielding under NSP CC-AA-401 Revision 0 is controlled as described above such that no functional changes or operational restrictions are created on SSCs required to perform an accident mitigation function. The review and evaluation processes incorporated in this procedure determine mode, out of service, and operational limitations to ensure that the effected SSCs are available

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Tracking No. 6G-99-0143
Activity No. NSP CC-AA-0401 Revision 0

to support and perform their accident mitigation function when required by the UFSAR, Technical Specifications, and owner-controlled documents. Therefore, the implementation of this procedure will not increase the probability of a malfunction of equipment important to safety.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

NSP CC-AA-401 Revision 0 evaluates the proposed installation of lead shielding and approves installations within the licensed design and operational criteria for the affected SSCs. Because:

- a) No functional changes or operating restrictions are placed on equipment required to support any accident or transient mitigation function.
- b) SSC operability is not impacted if required to be operational.

The possibility of creating an accident of transient different from those evaluated in the UFSAR as a result of installation of lead shielding under NSP CC-AA-401 Revision 0 is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Shielding installed under the controls of NSP CC-AA-401 Revision 0 does not impact any Technical Specifications. As discussed in Question 1, shielding will either be installed on inoperable equipment within pre-evaluated limits provided in the procedure or will require Engineering review if outside the limits of the procedure on operable piping. Therefore, the margin of safety defined in the Technical Specifications is not reduced. Structural Integrity, as described in TRM Section 3.4.f, is not impacted by this procedure.

Safety Evaluation Summary Form

Tracking No. 6G-99-0151

Activity No. BAP 1100-3 Revision 14, BAP 1100-3T1 Revision 4, BAP 1100-3T2 Revision 2, and NSP-CC-AA-201 Revision 1

DESCRIPTION:

The current Byron plant barrier impairment (PBI) program (BAP 1100-3 series procedures) is being replaced by a common NGG Plant Barrier Control Program controlled by Nuclear Station Procedure (NSP) CC-AA-201 Revision 1. Many of the steps in BAP 1100-3 will be moved to the new NSP. The following overall changes will be made:

- BAP 1100-3: Delete steps (Limitations and Actions, Main Body) which are now included in the NSP. Site-specific information pertaining to exemptions to the process (i.e., for which a PBI is not required) and to Compensatory Actions for Flooding will be maintained.
- BAP 1100-3T1: Procedure will be deleted. The PBI form will be incorporated into the NSP.
- BAP 1100-3T2: Addition of extra log information in accordance with the NSP.
- NSP-CC-AA-201: A new NGG common procedure similar to the current revision of BAPs 1100-3 and 1100-3T1. The NSP will contain the specific procedural steps which direct the initiator and reviewers to site specific documents to determine if a barrier requires a PBI and if so, the steps required to review the barrier and determine any compensatory actions that may be required in order to impair the barrier. The Byron site specific documents include BAP 1100-3 and BAP 1100-3A3, Door Matrix. BAP 1100-3A3 is not being changed at this time. The basic procedural steps in the NSP are similar to the steps being deleted from BAP 1100-3.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

This change is administrative in nature, basically moving much of the current PBI process steps from BAP 1100-3 to NSP-CC-AA-201. The probability or consequences of an accident is not increased by the changes made in these procedures because the procedures either:

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Safety Evaluation Summary Form

Tracking No. 6G-99-0151Activity No. BAP 1100-3 Revision 14, BAP 1100-3T1 Revision 4, BAP 1100-3T2 Revision 2, and NSP-CC-AA-201 Revision 1

- a) still require review of barrier impairment on the impact on operability of essential equipment, or
- b) have been pre-reviewed for impact on operability of essential equipment.

In either case, appropriate compensatory actions will continue to be required to maintain the plant within its design basis. Criteria are provided in the procedures which effectively determine whether a safety evaluation is required.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

These procedures provide for a review of the impact of barrier degradation on systems and functions to ensure that the plant is maintained within the design basis as evaluated in the safety analysis report (SAR). Therefore, accidents or malfunctions of a different type than evaluated in the SAR are not created. This change is administrative in nature, providing a common procedure for use across the NGG, and reducing the paperwork burden on the working groups. All required regulatory actions will continue to be performed. Criteria are still provided in the procedure which effectively determine whether a safety evaluation is required. Specifically, if personnel are expected to perform actions to compensate for a degraded barrier they must be dedicated to the action (no other duties), equipment must be readily available, and the action must be capable of being performed before the barrier is challenged. Other applications of compensatory actions required to meet design basis will receive a 50.59 evaluation or screening of a justification for why a 50.59 review is not necessary. Because the appropriate regulatory actions are still required to be performed, there is no possibility of the occurrence of an accident or malfunction of a type different than those evaluated in the SAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are directly affected by this change.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0189
Activity No. 1BVSR 3.1.10-1 and Plant Review 99-304

DESCRIPTION:

This surveillance performs a calibration of the ESF 4.16kV bus undervoltage and degraded voltage relays and associated degraded voltage timer. The proposed activity will place a jumper in the undervoltage relay control circuit to place the relay in a trip condition in accordance with Technical Specifications 3.3.2 and 3.3.5. The jumper will allow the calibration of an undervoltage relay within the allowed action times of the Technical Specifications. The use of the jumper will minimize the loss of undervoltage relay function and will permit calibration and testing of the circuits online. The undervoltage relays will be calibrated by removing one relay at a time. The degraded voltage relay test switches will be opened in order to isolate the degraded voltage relay functions (auxiliary relay trips to the bus feed breakers). The relays will be calibrated simultaneously and the appropriate action statement(s) will be entered for this condition.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity will not increase the probability of occurrence of any accident or transient. The relays sense the initiation of a transient or accident and process the actuation; therefore, the relay is not considered an accident or transient initiator. The activity will require entry into Technical Specifications for the unavailability of the instrumentation and diesel generator and this activity is expected to be completed within the time constraints provided therein. Therefore, since the redundant division of ESF equipment will be available to supply the necessary shutdown or accident loads from its respective diesel generator and the activity will be performed within the allowed outage times of Technical Specifications, the ability to mitigate an accident has not been affected. Therefore, there is no increase to the consequences of any accident or transient.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The accidents previously analyzed assume a loss of offsite power coincident with the accident. This change will not affect equipment so as to create an accident or transient different than the previously analyzed loss of offsite power. The loss of the degraded voltage function is included in Technical Specification 3.3.5 and 3.8.1 and the loss of the undervoltage channel is included in Technical Specification 3.3.2 and 3.3.5. Since this activity is bounded by the allowed outage time in Technical Specifications and the activity specifically affects accidents or

Safety Evaluation Summary Form

Tracking No. 6G-99-0189
Activity No. 1BVSР 3.1.10-1 and Plant Review 99-304

transients with a loss of offsite power, this activity will not create the possibility of an accident or transient of a different type than any previously evaluated.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The action statements for loss of a channel(s) or function (Technical Specification 3.3.5) for the diesel generator loss of power start instrumentation and the action statement for loss of an undervoltage channel (Technical Specification 3.3.2) on Bus 141 for the motor-driven auxiliary feedwater pump are included in the Technical Specifications. The redundant instrumentation remains unaffected and available. With the completion of the activities in the allowable time constraints delineated in Technical Specifications, there are no Technical Specifications or margins affected.

Safety Evaluation Summary Form

Tracking No. 6G-99-0207
Activity No. BVP 800-11 Revision 3

DESCRIPTION:

The proposed procedure revision to BVP 800-11 (Air Inleakage Detection) will inject inert gas into the main condenser. Injecting inert gas into the main condenser will reduce dissolved oxygen in the condensate system.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

This procedure contains administrative controls, appropriate cautions, and limitations which limit the amount of inert gas which can be added to the main condenser. In addition, all permanent plant equipment will be operated in accordance with established station procedures. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity affects the main condenser and the condenser offgas system. Analyses have been performed for a complete loss of condenser vacuum. These analyses are bounding for the proposed activity. No possibility of an accident or equipment malfunction of a different type is created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The bases for the Technical Specifications are unaffected. The Secondary Water Chemistry Program will not be adversely affected by this activity. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0208
Activity No. 1BGP 100-5 and 2BGP 100-5

DESCRIPTION:

The proposed activity will revise Byron General Procedures 1BGP 100-5 and 2BGP 100-5 (Plant Shutdown and Cooldown) to change the 50°F/hr limit in the BGP steps to 50°F in any one hour.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The change being implemented in the BGPs is changing the cooldown limit, which still results in a 50 degree cooldown in any hour, which is identical to the limits in the UFSAR when a 50 degree limit is used. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The change to the BGP results in the same limit assumed in the UFSAR such that the cooldown rate is limited to ensure that the auxiliary feedwater system and ultimate heat sink have adequate capacity for the different types of accidents. The change to the BGP did not introduce new failures unaccounted for in the UFSAR. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The Technical Specification limit is 100 degrees F in any one hour. The BGP still limits cooldown rate to 50 degrees in any one hour which is more restrictive than the Technical Specifications. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6G-99-0235
Activity No. NSP-CC-AA-404

DESCRIPTION:

The current Byron temporary leak repair procedure (BAP 1610-11 series procedures) is being replaced by a common NGG leak sealant and temporary leak repair procedure controlled by Nuclear Station Procedure (NSP) CC-AA-404 Revision 1. Many of the steps in BAP 1610-11 will be moved to the new NSP. The following overall changes will be made.

- BAP 1610-11T1: The procedure will be deleted and the temporary leak repair form will be incorporated into the NSP.
- BAP 1610-11T2: The procedure will be deleted at the same time as BAP 1610-11.
- NSP-CC-AA-404: A new NGG common procedure will be implemented similar to the current revision of BAPs 1610-11 and 1600-11T1. The NSP will contain the specific procedural steps which direct the initiator and reviewers to site documents to determine if a leak is acceptable. The new NSP procedure calls out precautions, limitations, and prerequisites along with a 10CFR 50.59 review.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

This change is administrative in nature moving much of the current leak repair process steps from BAP 1610-11 to NSP-CC-AA-404. The probability or consequences of an accident are not increased by the changes made in these procedures because the procedures require a review for the impact on the operability of essential equipment and a 50.59 review. Appropriate compensatory actions, precautions, limitations, and prerequisites will continue to be required to maintain the plant within its design basis.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

These procedures review of the impact of the repair on systems and functions to ensure that the plant is maintained within the design basis as evaluated in the safety analysis report (SAR). Therefore, accidents or malfunctions of a different type than evaluated in the SAR are not created. This change is administrative in nature, providing a common procedure for use across the NGG. Because the appropriate regulatory requirements, precautions, limitations, and prerequisites will

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0235
Activity No. NSP-CC-AA-404

still be met, the possibility of the occurrence of an accident or malfunction of a type different than those evaluated in the SAR is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are directly affected by this change. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6G-99-0237
Activity No. NSP-CC-AA-403

DESCRIPTION:

The current Byron freeze seal procedure (BAP 1600-16 series) is being replaced by a common NGG freeze seal Nuclear Station Procedure (NSP) CC-AA-403 Revision 1. Many of the steps in BAP 1600-16 have been moved to the new NSP. The following changes will be made:

- BAP 1600-16: This procedure will be deleted.
- BAP 1600-16T1: This procedure will be deleted and the temporary freeze seal checklist form will be incorporated into the NSP.
- NSP-CC-AA-403: A new NGG common procedure will be implemented similar to the current revision of BAPs 1600-16 and 1600-16T1. The NSP will contain the specific procedural steps which direct the initiator and reviewers to site documents to determine if a freeze seal is acceptable. The new NSP procedure calls out precautions, limitations, and prerequisites along with a 10CFR50.59 review to be completed if the freeze seal is on an operable pipe and is established as the out of service boundary. The NGG procedure also contains pre-engineered tables for acceptable spans for freeze seal assemblies. The installation of the freeze seal will be done using SMP-M-07, "Standard Maintenance Procedure", or BMP 3300-7, "Application of Freeze Seal to All Piping".

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

This change is administrative in nature moving much of the current freeze seal process steps from BAP 1600-16 to NSP-CC-AA-403. The probability or consequences of an accident are not increased by the changes made in these procedures because the procedures require a review of the freeze seal for the impact on the piping system and operability of essential equipment. Appropriate compensatory actions, precautions, limitations, and prerequisites will continue to be required to maintain the plant within its design basis.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-99-0237
Activity No. NSP-CC-AA-403

These procedures review the impact of the freeze seal on piping systems to ensure that the plant is maintained within the design basis as evaluated in the safety analysis report (SAR). Therefore, accidents or malfunctions of a different type than evaluated in the SAR are not created. This change is administrative in nature, providing a common procedure for use across the NGG. Because the appropriate regulatory requirements, precautions, limitations, and prerequisites will still be met, the possibility of the occurrence of an accident or malfunction of a type different than those evaluated in the SAR is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are directly affected by this change. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0012

Activity No. BOP CV-1a, 1BOSR 0.5-3.CV.2-1, 1BOSR 6.3.5-16, 1BOSR 0.5-2.CV.3-2, 1BOSR 3.2.7-607B, 1BOSR 3.2.9-2, 1BOSR 3.2.7-605B, 1BOSR 3.2.7-605A, 1BOSR 3.2.7-607A, and BOP RY-5

DESCRIPTION:

The purpose of this activity is to revise the referenced procedures (valve strokes, ESF relay tests, and system operating procedures) to reflect the installation of DCP 9700388. DCP 9700388 modified the testing circuits for valves 1CV8152 and 1CV8160 (letdown isolation valves) from a "go" circuit to a "no go" circuit to allow testing the ESF relay without closing the valves and isolating letdown. The Phase A isolation signal was also removed from valves 1CV8149A, B, and C (letdown orifice isolation valves) as part of the design change. The procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the changes in the testing circuit under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the changes in the testing circuit under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the changes in the testing circuit under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0017
Activity No. 1BOSR 6.3.3-1 and 1BOSR 6.3.4-1

DESCRIPTION:

The purpose of this activity is to revise the referenced Byron Operating Surveillances (containment integrity surveillances) to reflect the installation of DCP 9700568. DCP 9700568 removed process radiation (PR) monitors 1PR51J and 1PR52J from the containment building equipment and emergency hatches. The proposed procedure changes remove valves that were removed as part of the design change. The procedure changes are consistent with the design change in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the removal of valves associated with the PR monitors under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the removal of valves associated with the PR monitors under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the removal of valves associated with the PR monitors under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0031
Activity No. BCP 380-10

DESCRIPTION:

BCP 380-10 (Post Accident Sampling of Reactor Coolant, Radwaste, and Containment Air - General) was revised to provide direction for obtaining dose rate meters. It also provides direction on additional ways to verify instrument air, argon, and nitrogen availability. Component cooling and primary water were added as prerequisites and steps were added to verify alarm function.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The procedure performs prerequisites prior to sampling. There is no change to the safety analysis report because these prerequisites do not impact those functions.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The prerequisites prior to sampling do not have any impact on plant systems or plant equipment. There are no changes to previously evaluated accidents or malfunctions in the SAR. These prerequisites were present in other procedures and were simplified in this procedure.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Adding the prerequisites prior to sampling simplifies the pre-job briefings and does not impact any margin of safety as defined in the basis of the Technical Specifications.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0033
Activity No. BCP 800-4

DESCRIPTION:

BCP 800-4 (Post Accident Boron Analysis Using Fluoroborate Selective Ion Electrode and Sulfuric Acid) was revised to provide improvement for setting up the ion selective electrode meter.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The procedure revision provided greater detail on operation of the selective ion electrode. The revision has no impact on the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The revision does not change the original intent or actions of this procedure; therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The revision does not change the original intent or actions of this procedure; therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0034
Activity No. 1BCS 4.1.5.2.2-1

DESCRIPTION:

This procedure revision to 1BCS 4.1.5.2.2-1 (Unit 1 Reactor Coolant System Isolated/Non-Operating Loop Boron Shift Engineer Request) removes the reference to Byron Onsite Review 92-058 which provided a margin for boron analysis when comparing samples.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The procedure still performs loop stop boron comparisons without taking credit for the analytical differences between samples analyzed. This does not increase the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The analytical differences credited in the Onsite Review were conservative and removing them would also be conservative; therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The removal of the Onsite Review statement does not reduce the margin of safety, as defined in the basis for any Technical Specification, because the credit for the analytical sample results margin of error provided a band for acceptable results when less than or equal to the operating boron loop concentration.

Safety Evaluation Summary Form

Tracking No. 6H-99-0035
Activity No. 2BCS 4.1.5.2.2-1

DESCRIPTION:

This procedure revision to 2BCS 4.1.5.2.2-1 (Unit 2 Reactor Coolant System Isolated/Non-Operating Loop Boron Shift Engineer Request) removes the reference to Byron Onsite Review 92-058 which provided a margin for boron analysis when comparing samples.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The procedure still performs loop stop boron comparisons without taking credit for the analytical differences between samples analyzed. This does not increase the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The analytical differences credited in the Onsite Review were conservative and removing them would also be conservative; therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The removal of the Onsite Review statement does not reduce the margin of safety, as defined in the basis for any Technical Specification, because the credit for the analytical sample results margin of error provided a band for acceptable results when less than or equal to the operating boron loop concentration.

Safety Evaluation Summary Form

Tracking No. 6H-99-0047
Activity No. BOP AR/PR-M3

DESCRIPTION:

The proposed activity is a procedure revision to Byron Operating Procedure BOP AR/PR-M3 (mechanical valve lineup for process radiation monitoring system) to remove the process radiation monitor OPR10J pump relief valve which was removed under DCP 9500129. The procedure change is consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the mechanical lineup to reflect the removal of a pump relief valve under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the mechanical lineup to reflect the removal of a pump relief valve under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The process radiation monitor is not addressed in the Technical Specifications and the revision to the procedure to reflect the equipment configuration does not affect the margin of safety for any Technical Specification.

Safety Evaluation Summary Form

Tracking No. 6H-99-0049
Activity No. BISR 3.1.11-202

DESCRIPTION:

The proposed activity is a procedure revision to Byron Instrument Maintenance procedure BISR 3.1.11-202 to reflect the replacement of pen and ink strip chart paper recorders with solid state display paperless recorders under DCP 9800089. The new recorders use a color liquid crystal display for local indication and include an isolated RS-485 communication card to export the data to a data collection unit for storage. The procedure change is consistent with the design change in that the procedure directs testing of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the calibration procedure to reflect the installation of the new recorders under a previously evaluated design change. The recorders will be calibrated in accordance with the vendor recommendations and will not be in use during the performance of the calibration. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the calibration procedure to reflect the installation of the new recorders under a previously evaluated design change. The recorders will be calibrated in accordance with the vendor recommendations and will not be in use during the performance of the calibration. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The chart recorders are not addressed in the Technical Specifications and the revision to the procedure to reflect the installation of the new equipment does not affect the margin of safety for any Technical Specification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0053
Activity No. BAR RM11-4-2AR12J

DESCRIPTION:

The proposed activity is a procedure revision to Byron Annunciator Response procedure BAR RM11-4-2AR12J to remove setpoint references which are constantly changing due to the changing background associated with the containment ventilation isolation area radiation monitors. The revision adds a reference to a controlled document which is updated in conjunction with monitor setpoint changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the annunciator response procedure to reference a controlled document which is updated in conjunction with monitor setpoint changes. Adjusting the setpoint at which these monitors initiate an actuation ensures the isolation of the containment purge pathway at the desired actuation setpoint. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the annunciator response procedure to reference to a controlled document which is updated in conjunction with monitor setpoint changes. Adjusting the setpoint at which these monitors initiate an actuation ensures the isolation of the containment purge pathway at the desired actuation setpoint. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The monitors are still set to actuate at 10 mr/hr above background which is the criteria set in Technical Specification Table 3.3.6-1, note (b). Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0054
Activity No. BGP 100-1 and BGP 100-6

DESCRIPTION:

The proposed activity is a procedure revision to Byron General Procedures 100-1 and 100-6 to verify the containment building fuel handling accident area radiation monitor setpoints are adjusted during periods of reactor shutdown and startup in order to comply with the Technical Specification limit of 10 mr/hr above background.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the startup and shutdown procedures to verify the area radiation monitor setpoints comply with the Technical Specification limit of 10 mr/hr above background. Adjusting the setpoint at which these monitors initiate an actuation ensures the isolation of the containment purge pathway at the desired actuation setpoint. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the startup and shutdown procedures to verify the area radiation monitor setpoints comply with the Technical Specification limit of 10 mr/hr above background. Adjusting the setpoint at which these monitors initiate an actuation ensures the isolation of the containment purge pathway at the desired actuation setpoint. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The monitors are still set to actuate at 10 mr/hr above background which is the criteria set in Technical Specification Table 3.3.6-1, note (b). Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0055
Activity No. 1BGP 100-2T3

DESCRIPTION:

The proposed activity is a procedure revision to Byron General Procedure 1BGP 100-2T3 to remove steps associated with selecting the Nuclear Instrumentation System (NIS) channels on recorder NR-45. The NR-45 recorder was replaced under DCP 9800089 and now displays all eight NIS channels so individual channels no longer need to be selected. The procedure change is consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the procedure to reflect the installation of a new recorder under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the procedure to reflect the installation of a new recorder under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The new chart recorder is not addressed in the Technical Specifications and the revision to the procedure to reflect operation of the new recorder does not affect the margin of safety for any Technical Specification.

Safety Evaluation Summary Form

Tracking No. 6H-99-0057
Activity No. BOP RM-M1A, RH-M1B, RH-M2A, and RH-M2B

DESCRIPTION:

The proposed activity revises Byron Operating procedures BOP RM-M1A, RH-M1B, RH-M2A, and RH-M2B (Unit 1 and Unit 2 Train A and Train B Residual Heat Removal mechanical valve lineups) to add valves installed under DCPs 9600399 and 9600400. The valves and associated vent lines were added to address thermal binding/pressure locking concerns for valves 1SI8812A/B and 2SI8812A/B. The procedure changes are consistent with the design changes in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the mechanical lineup procedures to reflect the installation of valves under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the mechanical lineup procedures to reflect the installation of valves under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The affected valves are not addressed in the Technical Specifications and the revision to the procedures to reflect installation of the new valves does not affect the margin of safety for any Technical Specification.

Safety Evaluation Summary Form

Tracking No. 6H-99-0058
Activity No. BOP SA-M1

DESCRIPTION:

The proposed activity revises Byron Operating procedure BOP SA-M1 (station air mechanical valve lineup) to add valves installed under DCP 9800037. This design change added valves during the replacement of the River Screen House Air Compressors and River Screen House Air Receiver. The procedure change is consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the mechanical lineup procedure to reflect the installation of valves under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the mechanical lineup procedure to reflect the installation of valves under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The affected valves are not addressed in the Technical Specifications and the revision to the procedure to reflect installation of the new valves does not affect the margin of safety for any Technical Specification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0070Activity No. BOP CV-28DESCRIPTION:

The proposed activity is the development of a new procedure (Byron Operating procedure BOP CV-28) to flush 1/2CV8804A and associated piping to reduce local area dose rates. The proposed activity will be performed in Mode 5 or in Mode 6 with the Reactor Coolant System depressurized.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The Residual Heat Removal (RH) and Chemical and Volume Control (CV) systems will be aligned and operated as required by the Technical Specifications during the performance of this activity. Systems flows and pressures during the flush will not exceed the previously analyzed accident parameters for which this flowpath was designed. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The RH and CV systems will be aligned and operated as required by the Technical Specifications during the performance of this activity. Systems flows and pressures during the flush will not exceed the previously analyzed accident parameters for which this flowpath was designed. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The RH and CV systems will be aligned and operated as required by the Technical Specifications during the performance of this activity. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0074
Activity No. NEP-11-01 Revision 4

DESCRIPTION:

The proposed activity is the Byron site implementation of procedure NEP-11-01, Revision 4 and site appendix NEP-11-01BY, Revision 1 for clarifications and guidance for Independent Technical Review and PORC approval requirements.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

Procedure NEP-11-01 Revision 3 and Appendix NEP-11-01BY Revision 0 are already implemented at Byron. Implementation of the latest revision of an existing procedure, which is already being followed at Byron, is an administrative change and therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because this activity is administrative in nature and implements the latest revision of an already implemented procedure. The reviews and evaluations required by procedure NEP-11-01 Revision 4 will ensure that plant equipment will perform their designated safety and non-safety functions to assure that conditions for accidents or malfunctions of a different type are not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The change is administrative in nature and does not affect any parameters upon which Technical Specifications are based. Therefore, there is no reduction in the margin of safety.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0077
Activity No. 1BVSR 7.5.4-1 and 2BVSR 7.5.4-1

DESCRIPTION:

This set of procedure changes provides the same ability to run the auxiliary feedwater (AF) system in Mode 1 for testing as was changed in the original evaluation for 1BVS AF-3 and 2BVSR AF-3. The specific change is to add direction (precautions) when lining up the AF system using 1BVSR 7.5.4-1 or 2BVSR 7.5.4-1 to perform the surveillance in Mode 1.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The activity does not increase the probability of an accident or malfunction of equipment important to safety than previously evaluated in the safety analysis.

The proposed change provides operating personnel with guidance when conducting 1/2BVSR 7.5.4-1 in Mode 1. Upon the initial start of the AF system on a unit trip, the initial system parameters are the same. Therefore, the probability of an accident is not increased. During the increase in heat removal by the secondary side potentially due to a main steam line break, the AF pumps are assumed to be operating at the time of the incident and with maximum flow. At 30 minutes after the break, operator action is assumed to isolate AF flow. Since the AF pumps are already running they are encapsulated by the assumption and do not inhibit the response time of the operators. During the decrease in heat removal case, the failure and isolation of a steam generator is assumed to remove the capacity of the secondary side to mitigate an accident. In this case AF is already running and does not require operator action. In the decrease in reactor coolant inventory event, the accident affecting AF is a steam generator tube rupture. In this case the AF pumps are already in operation and do not inhibit the operators in isolating the affected generator in 11 minutes. The increase in reactor coolant system inventory due to the pressurizer filling is mitigated by the AF system; in this case, the AF pumps are already operating from the onset of the accident. Due to the fact that the AF pumps are already running there is no increase in the probability of an accident. In each case, the AF operation does not increase the onset or magnitude of a radioactive release or offsite dose and, therefore, does not increase the consequences of an accident or malfunction of equipment important to safety.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0077
Activity No. 1BVSR 7.5.4-1 and 2BVSR 7.5.4-1

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The change is to provide operating personnel guidance and to specify precautions to 1/2BVSR 7.5.4-1 when conducting the surveillance in Mode 1. The AF system is designed to run under the plant conditions of Modes 1, 2, 3, or 4. This change does not adversely impact systems or functions so as to create the possibility of an accident or malfunction of a type different from those evaluated in the safety analysis report. Therefore, since the change does not significantly change the operation of the plant systems, the activity does not create the possibility of an accident or transient of a different type than any previously evaluated.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The reason for the proposed activity is to provide operations personnel guidance when performing 1/2BVSR 7.5.4-1 in Mode 1. This is to be accomplished so as to allow more time to conduct VT-2 examination. The effects on the primary and secondary plant are less in Mode 1. The overall cooldown rate and control of the primary plant is more effective. This change does not affect any parameters upon which Technical Specifications are based. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0081
Activity No. NSD-EIS-98-008

DESCRIPTION:

The proposed activity reviews a revision to Westinghouse procedure NSD-EIS-98-008 used for the upgrade of the control rod drive mechanism (CRDM) and digital rod position indication (DRPI) cables and connectors at the reactor head and connection plate installed under DCPs 9800264, 9800265, 9800266, and 9800267. The procedure revision is consistent with the design changes in that the procedure directs installation of the equipment in accordance with the design. Therefore, the procedure revision is bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity reviews a revision to a Westinghouse procedure used for the upgrade of the CRDM and DRPI cables and connectors under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity reviews a revision to a Westinghouse procedure used for the upgrade of the CRDM and DRPI cables and connectors under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity reviews a revision to a Westinghouse procedure used for the upgrade of the CRDM and DRPI cables and connectors under previously evaluated design changes and does not modify plant equipment. The revision to the procedure does not affect the margin of safety for any Technical Specification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0106
Activity No. BOP AR/PR-E4

DESCRIPTION:

The proposed activity revises Byron Operating Procedure BOP AR/PR-E4 (system electrical lineup) due to the removal of process radiation monitors 1PR51J and 1PR52J under DCP 9700568. The procedure changes are consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the electrical lineup to reflect the removal of process radiation monitors under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the electrical lineup to reflect the removal of process radiation monitors under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the electrical lineup to reflect the removal of process radiation monitors under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the Technical Specifications is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0109
Activity No. BOP AR/PR-M1

DESCRIPTION:

The proposed activity revises Byron Operating Procedure BOP AR/PR-M1 (system mechanical lineup) due to the removal of process radiation monitors 1PR51J and 1PR52J under DCP 9700568. The procedure change is consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the mechanical lineup to reflect the removal of process radiation monitors under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the mechanical lineup to reflect the removal of process radiation monitors under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the mechanical lineup to reflect the removal of process radiation monitors under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the Technical Specifications is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0112

Activity No. BOP DG-11T2, BOP DG-M2, BOP DG-M2A, BOP DG-M2B
BAR 2PL07J-1-D6, BAR 2PL08J-1-D6

DESCRIPTION:

The purpose of these procedure revisions was to update station procedures BOP DG-11T2, BOP DG-M2, BOP DG-M2A, BOP DG-M2B, BAR 2PL07J-1-D6, BAR 2PL08J-1-D6 and Test Report 2PDS-DG278A/B to incorporate the installation of lube oil filter differential pressure instrumentation installed under DCP 9800561. The procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises several station procedures to reflect the installation of lube oil filter differential pressure instrumentation under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises several station procedures to reflect the installation of lube oil filter differential pressure instrumentation under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises several station procedures to reflect the installation of lube oil filter differential pressure instrumentation under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the Technical Specifications is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0115Activity No. BOP SD-102 Temporary Change and Revision 1DESCRIPTION:

The proposed activity revised Byron Operating Procedure BOP SD-102 to allow installation and removal of a temporary crosstie to the Unit 2 hotwell tank with appropriate tracking and verification. This is to allow water flow when the Unit 1 hotwell is not operable (as in Unit 1 outages). This was part of the evaluation and actions governed under DCP 9500264. The procedure change is consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety are not increased since safety related systems are not impacted by this installation. The drain line does not tie into any safety systems and does not alter the consequences of an accident.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The drain line does not tie into any safety system and does not create the possibility of a new accident or malfunction of a different type. Grab samples can be routed to the sample sink and to the floor drains, if needed, in the event of a loss of the drain line. The new drain line is designed to operate with flow parameters of existing sample systems and will drain the sample flow to the blowdown condenser hotwell tank.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The change does not affect any parameters upon which Technical Specifications are based; therefore, there is no reduction in the margin of safety.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0137
Activity No. BOP SA-1

DESCRIPTION:

The proposed activity is a procedure revision to Byron Operating Procedure BOP SA-1 (Operation of the Station Air Compressors) to add non-essential service water cooling isolation valves installed under DCP 9600383. The procedure change is consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the procedure to reflect the addition of cooling water isolation valves under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the procedure to reflect the addition of cooling water isolation valves under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The Station Air and non-essential service water systems are not addressed in the Technical Specifications and the revision to the procedure to reflect the equipment configuration does not affect the margin of safety for any Technical Specification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0144
Activity No. 0BISR 3.e.3-200

DESCRIPTION:

The proposed activity is a procedure revision to Byron Instrument Maintenance calibration procedure 0BISR 3.e.3-200 to reflect the installation of a new analyzer and sample selector switch to replace the automatic waste gas analyzer and sequencer under DCP 9800235. The procedure change is consistent with the design change in that the procedure directs testing of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the calibration procedure to reflect the installation of a new analyzer and sample selector under a previously evaluated design change. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the calibration procedure to reflect the installation of a new analyzer and sample selector under a previously evaluated design change. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The revision to the calibration procedure to reflect the installation of the new equipment installed under a previously evaluated design change does not affect the margin of safety for any Technical Specification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0147
Activity No. 2BGP 100-A13 Revision 2

DESCRIPTION:

The proposed activity is a procedure revision to Byron General Procedure 2BGP 100-A13 to reflect the replacement of pen and ink strip chart paper recorders with solid state display paperless recorders under approved design changes. The change to the procedure removes the words "Strip Chart Recorder" to allow consistency for the newer digital recorders in the affected procedure. The procedure change is consistent with the design changes in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the procedure to reflect the installation of the new recorders under previously evaluated design changes and does not modify any plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the procedure to reflect the installation of the new recorders under previously evaluated design changes and does not modify any plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The chart recorders are not addressed in the Technical Specifications and the revision to the procedure to reflect the installation of the new equipment does not affect the margin of safety for any Technical Specification.

Safety Evaluation Summary Form

Tracking No. 6H-99-0170
Activity No. 1BVSr 6.1.1-9 Temporary Procedure Change

DESCRIPTION:

The proposed activity is a temporary procedure revision to Byron Surveillance Procedure 1BVSr 6.1.1-9 (CV system containment isolation valve leakrate testing procedure) to change jumper locations to reflect new interlocks added by DCP 9700388. The procedure change is consistent with the design change in that the procedure directs testing of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises jumper locations to reflect new interlocks added under a previously evaluated design change. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises jumper locations to reflect new interlocks added under a previously evaluated design change. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises jumper locations to reflect new interlocks added under a previously evaluated design change. Therefore, the margin of safety for any Technical Specification is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0183Activity No. 1BVSr 6.1.1-9DESCRIPTION:

The proposed activity revises Byron Surveillance Procedure 1BVSr 6.1.1-9 (CV system containment isolation valve leakrate testing procedure) to change jumper locations to reflect new interlocks added by DCP 9700388. The procedure change is consistent with the design change in that the procedure directs testing of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises jumper locations to reflect new interlocks added under a previously evaluated design change. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises jumper locations to reflect new interlocks added under a previously evaluated design change. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises jumper locations to reflect new interlocks added under a previously evaluated design change. Therefore, the margin of safety for any Technical Specification is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0207
Activity No. 2BOSR 3.6.5-615B Temporary Procedure Change

DESCRIPTION:

The proposed activity is a small change from the originally planned temporary procedure change. The original change was to install a jumper only if test switch S841 failed during the surveillance. The new activity is to install a jumper with an integral switch without first having attempted operation of the test switch S841. The validated change affords the same functionality of the original change yet provides greater control of testing than the original plan. Since there was no real difference from the original change in terms of functionality (jumper installed across R11 and R12 of test switch S841), the original safety evaluation addresses the validated change as well. Test switch S841 has experienced an intermittent failure to operate correctly during slave relay testing. The jumper steps were added to remove the jumpers both after the slave relay energizes and in the Emergency Exit section.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The ESFAS test circuit does not control plant parameters and thus is not an initiator of any accident or transient. The test circuit only verifies ESFAS components will perform their functions when required. The jumper will perform the same function as the test switch internal components. Slave relay K622 operates to close containment ventilation valves 2VQO04B, 2VQO05B and 2VQO03. Closure of the containment ventilation valves minimized release of radioactivity in the event of an accident. The purpose and function of the slave relay is not altered by the installation of the jumpers. The slave relay will receive the same voltage with the jumpers installed as with the test switch operating correctly. Installation of the jumpers will not prevent the slave relay from performing its safety function in the event of an accident or transient and thus the consequences remain unchanged.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The EFSAS test circuit does not control plant parameters and thus is not the initiator of any accident or transient. The test circuit has no affect on the normal operation of the slave relay in the event of an accident or transient. The function and output of the test circuit is not changed by installation of the jumpers on the test switch. The function and operation of the slave relay are not changed by installation of the jumpers on test switch. Insulated jumpers will minimize interference with other components in the cabinet. A drawing identifying the

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Safety Evaluation Summary Form

Tracking No. 6H-99-0207

Activity No. 2BOSR 3.6.5-615B Temporary Procedure Change

proper test switch contacts will be temporarily added to the procedure to ensure the jumpers are installed on the correct contacts. The jumpers will perform the same function as the test switch.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The margin of safety, as defined in the basis for any Technical Specification, is not reduced because the Technical Specification requirement to test the slave relay is not affected by installation of the jumpers. The function of the test circuit is not changed. The voltage to the slave relay will be the same with the jumpers installed or the test switch operating correctly. Temporary installation of jumpers across test switch S841 will not prevent slave relay K622 from operating to close its assigned valves in the event of an EFSAS actuation.

Safety Evaluation Summary Form

Tracking No. 6H-99-0211
Activity No. RP-AP-900

DESCRIPTION:

The original evaluation was written for a Byron specific procedure to change the 1PR27J and 2PR27J (steam jet air ejector process radiation monitor) setpoints, based on reactor coolant system (RCS) noble gas activity, to determine RCS primary to secondary leak rates at the request of unit chemists. The new procedure (NSP RP-AA-900) is applicable at both Byron and Braidwood. Due to slightly different setpoint control documents and setpoint change processes, an attachment was included for each site to track the different processes. No changes in setpoint calculation methodology were introduced.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The 1PR27J and 2PR27J process radiation monitor initiates an audible annunciator in the control room when it is alert and high alarm setpoints are reached. Operators perform manual activities based on these alarms which are associated with given RCS primary to secondary leak rates. This procedure is used to calculate a setpoint based on known RCS concentrations and desired leak rates. It does not affect how any plant structure, system, or component will respond in the event of an accident or equipment malfunction.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

This setpoint calculation procedure does not increase the possibility of an accident or malfunction of equipment of a different type than previously evaluated because no plant structures, systems, or components are affected by the change. The methodology used is the same as that evaluated under the previous evaluation; only the format has changed.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The UFSAR design bases for RCS primary to secondary leak rate is 1 gpm for all steam generators (1440 gpd/steam generator). This procedure places an administrative limit of 150 gpd on the highest allowable setpoint to be calculated. Therefore, the margin of safety is not reduced for any structure, system, or component.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0225
Activity No. BIP 2500-031

DESCRIPTION:

The proposed activity is a procedure revision to Byron Instrument Maintenance procedure BIP 2500-031 to reflect the replacement of pen and ink strip chart paper recorders with solid state display paperless recorders under evaluated design changes. The new recorders use a color liquid crystal display for local indication and include an isolated RS-485 communication card to export the data to a data collection unit for storage. The changes to the calibration procedure for the new equipment installed by the modification were evaluated under this activity. The procedure change is consistent with the design changes in that the procedure directs testing of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the calibration procedure to reflect the installation of the new recorders under previously evaluated design changes. The recorders will be calibrated in accordance with the vendor recommendations and will not be in use during the performance of the calibration. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the calibration procedure to reflect the installation of the new recorders under previously evaluated design changes. The recorders will be calibrated in accordance with the vendor recommendations and will not be in use during the performance of the calibration. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The chart recorders are not addressed in the Technical Specifications and the revision to the procedure to reflect the installation of the new equipment does not affect the margin of safety for any Technical Specification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0234
Activity No. BOP DG-8

DESCRIPTION:

The proposed activity is a procedure revision to Byron Operating Procedure BOP DG-8 (Swapping Parallel Path Filters or Strainers) to reflect installation of new vent valves on the diesel generator turbocharger lube oil filters installed under DCPs 9700506 and 9700507. The procedure change is consistent with the design changes in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the procedure to reflect installation of new vent valves under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the procedure to reflect installation of new vent valves under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the procedure to reflect installation of new vent valves under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0243

Activity No. BOP RH-3, 3T1, 4, M1B, M2B, BOP SI-M1, M1C, M2, M2C, 1BOSR 5.2.2-1, 2BOSR 5.2.2-1, 1BOSR 6.3.3-1, and 2BOSR 6.3.3-1

DESCRIPTION:

The proposed activity revises the referenced procedures to add new high point vent valves installed under DCPs 9900161 and 9900162. The procedure changes are consistent with the design changes in that the procedures direct operation and testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to add new high point vent valves under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to add new high point vent valves under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to add new high point vent valves under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0253
Activity No. CWPI-NSP-TQ-1-12

DESCRIPTION:

The proposed activity is revision of Common Work Package Instruction (CWP)-NSP-TQ-1-12, Conduct of Training Manual of Common Work Practice Instructions, Training Programs-Instruction Twelve, Nuclear Oversight Training. This procedure is administrative in nature and provides guidance for administering the training program for the Nuclear Oversight (N.O.) Department. Revision 1 puts the procedure into the appropriate CWPI template format, moves the qualification and certification matrix from Section 4 of the procedure to the Nuclear Training Administrative Forms and Templates (NTAFTS) program, references these NTAFTS in the procedure, updates positions/titles, and provides additional clarity.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

No accidents or transients are affected. The proposed activity, as described above, does not have any affect on any previously analyzed consequences of any accident or transient. The proposed activity has no affect on equipment or the consequences of a malfunction of equipment. The subject procedure is administrative in nature.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

Plant operation and plant systems, structures, or components are not affected. The proposed activity has no effect on equipment failures. The subject procedure is administrative in nature. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are affected. Technical Specification safety limit, limiting safety system setting, or limiting condition for operation requirements, associated action items, associated surveillances, or bases are not affected.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0257
Activity No. 0BISR 3.e.3-200

DESCRIPTION:

The proposed activity is a procedure revision to Byron Instrument Maintenance calibration procedure 0BISR 3.e.3-200 to reflect the installation of a new analyzer and sample selector switch to replace the automatic waste gas analyzer and sequencer under DCP 9800235. The procedure change is consistent with the design changes in that the procedure directs testing of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the calibration procedure to reflect the installation of a new analyzer and sample selector under a previously evaluated design change. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the calibration procedure to reflect the installation of a new analyzer and sample selector under a previously evaluated design change. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The revision to the calibration procedure to reflect the installation of the new equipment installed under a previously evaluated design change does not affect the margin of safety for any Technical Specification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0274
Activity No. BOP RY-M2

DESCRIPTION:

The proposed activity is a procedure revision to Byron Operating Procedure BOP RY-M2 (mechanical valve lineup for pressurizer system) to add valves installed under DCP 9700520. These new valves address Generic Letter 96-06 penetration overpressurization concerns. The procedure change is consistent with the design changes in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the mechanical lineup to reflect the installation of valves under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the mechanical lineup to reflect the installation of valves under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the mechanical lineup to reflect the installation of valves under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0275
Activity No. BOP CV- M2 and BOP CV-M2C

DESCRIPTION:

The proposed activity is a procedure revision to Byron Operating Procedures BOP CV-M2 and BOP CV-M2C (mechanical valve lineup for chemical and volume control system) to remove a valve removed as part of the design change to remove the Boron Concentration Monitoring system. The system was removed under DCP 9700320. The procedure changes are consistent with the design change in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the mechanical lineups to reflect the removal of a valve under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the mechanical lineups to reflect the removal of a valve under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the mechanical lineups to reflect the removal of a valve under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0276
Activity No. BAR 0-31-C6 and BAR 0-34-C4

DESCRIPTION:

The proposed activity is implementation of new Byron Annunciator Response procedures BAR 0-31-C6 and BAR 0-34-C4 (auxiliary building supply/exhaust fan vibration trouble) to reflect the installation of new fan vibration monitoring equipment under DCP 9600228. The procedure changes are consistent with the design change in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity implements new annunciator response procedures to reflect the installation of vibration monitoring equipment under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity implements new annunciator response procedures to reflect the installation of vibration monitoring equipment under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity implements new annunciator response procedures to reflect the installation of vibration monitoring equipment under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0277
Activity No. BAR 2-18-B3 and BAR 2-18-B16

DESCRIPTION:

The proposed activity revises Byron Annunciator Response procedures BAR 2-18-B3 and BAR 2-18-B16 (main turbine supervisory trip and alarm setpoint exceeded, respectively) to reflect the installation of new solid state paperless chart recorders in the main control room installed under DCP 9700317. The procedure changes are consistent with the design change in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises annunciator response procedures to reflect the installation of new solid state paperless chart recorders in the main control room under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises annunciator response procedures to reflect the installation of new solid state paperless chart recorders in the main control room under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises annunciator response procedures to reflect the installation of new solid state paperless chart recorders in the main control room under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0278
Activity No. BOP CC-15

DESCRIPTION:

The proposed activity is a procedure revision to Byron Operating Procedure BOP CC-15 (Switching Operating and Standby Component Cooling System Pump) to reflect the installation of an interposing time delay relay in the pumps low discharge header pressure automatic start circuitry installed under DCPs 9900413 and 9900414. The procedure change is consistent with the design changes in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedure to reflect the installation of a time delay under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedure to reflect the installation of a time delay under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedure to reflect the installation of a time delay under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0307Activity No. BAP 700-3DESCRIPTION:

The proposed activity revises Byron Administrative Procedure (BAP) 700-3 (Issue, Control and Installation of Temporary Shielding) to add a note describing the applicability of procedure NSP-CC-AA-401 in relation to the BAP. The Nuclear Station Procedure (NSP) is the new governing procedure for lead shielding but the BAP is still needed to control shielding activities that were initiated before the NSP was approved for use.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The revision to the BAP does not increase the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report because both procedures govern the installation of temporary lead shielding and ensure proper reviews are performed for temporary lead shielding installation. The revision to the BAP will identify when the BAP or the NSP should be used for temporary lead shielding installation.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The revision to the BAP does not create possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report because both procedures govern the installation of temporary lead shielding and ensure proper reviews are performed for temporary lead shielding installation. The revision to the BAP will identify when the BAP or the NSP should be used for temporary lead shielding installation.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

There is no impact on the margin of safety, as defined in the basis for any Technical Specification, since both procedures govern the installation of temporary lead shielding and ensure proper reviews are performed for temporary lead shielding installation. The revision to the BAP will identify when the BAP or the NSP should be used for temporary lead shielding installation.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0317
Activity No. STD-FP-1998-8217

DESCRIPTION:

The proposed activity supports the performance of procedure STD-FP-1998-8217, "Procedure for Repair of a Damaged Grid on an Irradiated Fuel Assembly". This procedure is used to repair a fuel assembly's grid strap. The bottom inconel grid strap on fuel assembly W31J on Face 4 is damaged such that a vane is bent at 90 degrees to the strap on the upper right side of the inconel grid, resulting in contact with rods 15 and 16.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The repair of a grid for a fuel assembly does not have an operability impact on the fuel handling long handle tool or spent fuel pool bridge crane. The physical contact of the vise grip tool with the fuel assembly will be controlled so as not to increase the probability of dropping the fuel assembly. Since only one fuel assembly will be repaired at a time, the accident consequences of UFSAR Section 15.7.4.2.1 bound this activity. This accident assumes that a mechanical or equipment operator error results in dropping a fuel assembly into the refueling pool during its transfer from one position in the pool to another. Additionally, since the long handled tool will be used to move/lift the fuel assembly, adequate water shielding depth will be maintained during the activity.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The repair of the damaged grid will occur with the fuel assembly being suspended by use of the normal long handle hook with associated spent fuel pool crane limits and controls. Use of tooling as described in STD-FP-1998-8217 used to manipulate/repair a grid vane will have no impact on the physical structure of fuel assembly rods.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The grid strap repair does not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0318
Activity No. 0BOL 10.a, 10.b, 10.c, 10.d, 10.e, 10.f, and 10.g

DESCRIPTION:

The proposed activity revises the referenced Technical Requirements Manual (TRM) Action Requirement procedures (BOLs). These procedures are administrative tracking procedures to following the Required Actions for TRM Required Actions and involve the fire protection system. The procedure changes are as a result of revisions to TRM Section 3.10, "Fire Protection" and are implementing approved TRM changes to Conditions, Required Actions, and Completion Times.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced BOLs to reflect approved changes in TRM Section 3.10 that have already been evaluated under a previous evaluation. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced BOLs to reflect approved changes in TRM Section 3.10 that have already been evaluated under a previous evaluation. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced BOLs to reflect approved changes in TRM Section 3.10 that have already been evaluated under a previous evaluation. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0322
Activity No. BOP FC-9 and BOP FC-M1

DESCRIPTION:

The proposed activity is procedure revisions to Byron Operating Procedures BOP FC-9 (Placing the Skimmer Loop in Service) and BOP FC-M1 (mechanical valve lineup for fuel pool cooling system) to reflect the installation of new floating spent fuel pool skimmers and isolation valves on existing skimmer suction lines installed under DCP 9800532. The procedure changes are consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the installation of new floating spent fuel pool skimmers and isolation valves on existing skimmer suction lines under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the installation of new floating spent fuel pool skimmers and isolation valves on existing skimmer suction lines under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the installation of new floating spent fuel pool skimmers and isolation valves on existing skimmer suction lines under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0326

Activity No. 1BOSR CO-R1, 2BOSR CO-R1, 1BOSR XLE-R1, BOP CO-M1, and BOP CO-M2

DESCRIPTION:

The proposed activity is procedure revisions to the referenced procedures to reflect the installation of new isolation valves and vent valves on the carbon dioxide system. The isolation valves allow the carbon dioxide system odorizers to be isolated from the main header during testing. The vent valves are used to depressurize the header following testing. The valves were installed under DCP 9700313. The procedure changes are consistent with the design changes in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the installation of new isolation valves and vent valves on the carbon dioxide system under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the installation of new isolation valves and vent valves on the carbon dioxide system under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the installation of new isolation valves and vent valves on the carbon dioxide system under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0333
Activity No. BOP DG-8, BOP DG-M2, BOP DG-M2A

DESCRIPTION:

The proposed activity is a procedure revision to Byron Operating Procedure BOP DG-8 (Swapping Parallel Path Filters or Strainers) and BOPs DG-M2 and BOP DG-M2A (mechanical valve lineup procedures) to reflect installation of new vent valves on the diesel generator turbocharger lube oil filters installed under DCP 9700507. The procedure changes are consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect installation of new vent valves under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect installation of new vent valves under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect installation of new vent valves under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0343
Activity No. OBOSR FP-A2 and OBOSR 10.b.11-1

DESCRIPTION:

The proposed change is a revision to OBOSR 10.b.11-1 to change the procedure number (no change in content) to a non-Technical Requirements Manual (TRM) surveillance, OBOSR FP-A2. The procedure was also revised to change the Limitations and Actions to match the revised TRM. TRM Section 3.10, "Fire Protection," was revised to clearly specify plant fire protection (FP) equipment subject to the conditions of TRM Section 3.10, to eliminate compensatory measures that are not needed, and to specify compensatory measures that are appropriate for the FP function governed by the TRM. The procedure changes are consistent with the TRM change. Therefore, the procedure changes are bounded by the previous evaluation performed for the TRM change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises procedures to reflect a previously evaluated change in the TRM and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises procedures to reflect a previously evaluated change in the TRM and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Technical Specifications are not affected by this change. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0344

Activity No. BFP FH-101

DESCRIPTION:

The proposed activity implements Byron Fuel Handling Procedure (BFP) FH-101 (Lower Stuck Fuel Assembly From Refueling Machine With Polar Crane). The purpose of the procedure is to lower a fuel assembly that is unable to travel up or down in the refueling machine mast to a safe condition on the core plate so repair work can be performed on the refueling machine. This validation evaluated a previous activity (SPP 99-023) and changes the previous activity into a permanent procedure.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The use of the polar crane to lower the fuel assembly will not adversely affect the ability of the manipulator crane to support and restrain the fuel assembly or to allow fuel assembly placement into the core. The polar crane capacity meets/exceeds that of the refueling machine. None of the mitigation systems for the fuel handling accident are affected. Dropping a fuel assembly from the polar crane is no worse than dropping a fuel assembly from the refueling machine.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The auxiliary hook is attached to the manipulator crane cable where it provides a restraint function and then the assembly is lowered using the polar crane. The Train B residual heat removal system, which is operating during the installation period, takes suction from the "C" hot leg located on the opposite side of the core from the proposed activity and will therefore not be affected.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications or Technical Specification Bases define a margin of safety for this Mode 6 refueling activity.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0361
Activity No. BOP MS-M2

DESCRIPTION:

The proposed activity revises Byron Operating Procedure (BOP) MS-M2 (main steam system mechanical valve lineup) to reflect the installation of main steam isolation valve accumulator relief valve isolation valves and bypass valves installed under DCP 9700178. The procedure change is consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the mechanical valve lineup procedure to reflect valves installed under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the mechanical valve lineup procedure to reflect valves installed under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the mechanical valve lineup procedure to reflect valves installed under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

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Tracking No. 6H-99-0392
Activity No. OBOSR 0.1-0

DESCRIPTION:

The proposed activity will remove all references to procedure OBOSR 10.g.1 (Unlock Fire Door Surveillance) and all associated actions from procedure OBOSR 0.1-0 (Shift/Daily Operating surveillance). OBOSR 10.g.1 was revised to extend the surveillance frequency from daily to weekly. Since OBOSR 10.g.1 is now performed weekly, there is not a need to document the unlocked fire door surveillance in OBOSR 0.1-0. The procedure was revised to match the revised Technical Requirements Manual and is consistent with the TRM change. Therefore, the procedure change is bounded by the previous evaluation performed for the TRM change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises a procedure to reflect a previously evaluated change in the TRM and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises a procedure to reflect a previously evaluated change in the TRM and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Technical Specifications are not affected by this change. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-99-0398
Activity No. Holtec Procedures

DESCRIPTION:

The proposed activity implements of the following Holtec procedures:

HPP-80944-7	Site Receipt Inspection of Spent Fuel Racks, Revision 1
HPP-80944-11	On-Site Handling, Installation, and Removal Procedure, Revision 2
HPP-80944-12	Pre-Installation Free Path Gage Testing Procedure for Spent Fuel Racks, Revision 1
HPP-80944-13	Post-Installation Drag Test Procedure for Spent Fuel Racks, Revision 1
HPP-80944-14	Site Cell Rework Procedure, Revision 1
HPP-80944-15	Liner Inspection Procedure, Revision 1
HPP-80944-16	Leak Detection Procedure, Revision 1
HPP-80944-17	Pool Liner Repair Procedure, Revision 2
HPP-80944-18	Underwater Vacuum Cleaning Procedure, Revision 1
HPP-80944-20	ALARA Plan Procedure, Revision 1
HPP-80944-21	Site Cleaning Procedure For Fuel Racks, Revision 1
HPP-80944-22	Pool Wall/Floor Interference Removal Procedure, Revision 1
HPP80944-23	Post Seismic Rack Inspection Procedure, Revision 1

These procedures will be used to replace the existing 23 Joseph Oat spent fuel pool storage racks (4 Region I and 19 Region II) with 24 Holtec International spent fuel pool storage racks (4 Region I and 20 Region II). The change will have no adverse impact on spent fuel storage. Due to design differences, 114 additional storage cells will be gained.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The probability of an accident was considered for the following:

- a) spent fuel assembly dropped onto the spent fuel pool floor
- b) spent fuel assembly dropped between racks
- c) spent fuel assembly dropped between a rack and the spent fuel pool wall
- d) spent fuel assembly loaded contrary to placement restrictions
- e) spent fuel assembly dropped onto a rack
- f) spent fuel cask drop
- g) change in spent fuel pool water temperature
- h) loss of spent fuel pool cooling
- i) loss of spent fuel pool water level

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Tracking No. 6H-99-0398
Activity No. Holtec Procedures

- j) water quality of spent fuel pool.

The procedures listed above, in conjunction with existing ComEd procedures, ensure compliance with the requirements of NUREG-0612. Crane use and actual movement of spent fuel will continue to be performed with existing plant equipment under existing ComEd procedures and training requirements. Therefore, the probability or consequence of an accident is not increased by the use of these procedures.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The replacement of the existing Byron spent fuel pool storage racks was evaluated for the possibility of creating a new or different accident. The following case was reviewed with respect to the installation activities:

An accidental drop of a rack into the spent fuel pool

A construction accident resulting in a drop of a rack, aluminum pick, lift rig, or lift rig storage device is an extremely unlikely event. Operability of the cranes will be checked prior to use. Lift equipment and rigging will also be inspected prior to use. Operators of lift equipment and cranes will be trained prior to use. Safe load paths will be followed and Byron commitments to the provisions of NUREG-0612 will be implemented by use of written procedures that have been utilized for numerous other similar rack installation projects. The Technical Requirements Manual (TRM) requires that fuel handling building crane loads be limited to 2000 pounds when travelling over fuel assemblies. A component drop would present limited structural damage to the spent fuel pool slab on grade due to the slab being founded on rock and soil. Local concrete crushing and possible liner puncture could occur. Failure of the liner would not result in a significant loss of water and no safety related equipment would be affected by the leakage. Make-up water is available from three (3) separate sources:

- 1) two 500,000 gallon borated Refueling Water Storage Tanks,
- 2) two 500,000 gallon non-category 1 Primary Water Tank unborated backup water sources, and
- 3) the unborated Safety Category 1 fire protection system, available for spent fuel pool water make-up.

A component drop, therefore, does not create the possibility of creating a new or different kind of accident.

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Tracking No. 6H-99-0398
Activity No. Holtec Procedures

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Although the margin of safety defined in the bases for the Technical Specifications is not reduced as indicated below, it was identified that Technical Specification changes are required. A Technical Specification change request has been submitted via letter from R. Krich to NRC dated 3/24/99. This modification will not be installed until receipt of the requested Technical Specification changes.

Discussion for Technical Specification 3.7.15 "Spent Fuel Pool Boron Concentration"

The function of the spent fuel pool is to store fuel assemblies in a subcritical and coolable configuration throughout all environmental and abnormal loadings, such as earthquakes, dropped fuel assemblies, or loss of spent fuel pool cooling. Because the Joseph Oat storage racks need to be operable during and until rack change-out is complete, the Technical Specification needs to address both the requirements for use of the Joseph Oat storage racks as well as the Holtec International storage racks.

The Holtec International spent fuel storage racks are designed to meet all applicable requirements for safe storage of spent fuel and are functionally compatible with the spent fuel pool.

The Holtec Licensing Report has analyzed the consequences of this reracking project by area. In each area (i.e., criticality, seismic, structural, thermal hydraulics, and radiological exposure) design basis margins of safety will be maintained. Installation controls specified in Byron commitments to NUREG-0612 preserve the margins of safety with regard to heavy load restrictions. Compliance with the Byron design basis limits and adherence to these procedures will preclude reducing margins of safety.

The margin of safety, for either the Joseph Oat or Holtec International racks, or any combination of the two types of racks, is not reduced as demonstrated by analysis of the seismic, structural, thermal hydraulic, criticality, and radiological aspects of this design change. The Byron design basis spent fuel pool maximum bulk temperature acceptance limit of 140°F has been demonstrated to be preserved by analysis. In addition, it has been shown that under the maximum decay heat load scenario of a full core discharge with a 100 hour hold time following a normal discharge occurring 17 days earlier, the local water temperature was shown to be subcooled. Cladding failure due to extreme thermal stress was shown to be not credible. Criticality calculations show that keff will be maintained within the margin specified above for both the Joseph Oat and the Holtec International racks. The new Holtec International spent fuel pool storage racks

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Activity No. Holtec Procedures

have been designed in accordance with the Byron design bases requirements and the NRC OT Position for Review and Acceptance of Spent Fuel Storage and Handling Applications, as amended on January 18, 1979.

Since all aspects of the design change have been demonstrated to be within the existing design bases for Byron Station and the NRC requirements applicable to spent fuel storage, the proposed changes do not involve a reduction in the margin of safety.

Discussion for Technical Specification 3.7.16 "Spent Fuel Pool Storage"

The function of the spent fuel pool is to store fuel assemblies in a subcritical and coolable configuration throughout all environmental and abnormal loadings, such as earthquakes, dropped fuel assemblies, or loss of spent fuel pool cooling. Because the Joseph Oat storage racks need to be operable during and until rack change-out is complete, the Technical Specification needs to address both the requirements for use of the Joseph Oat storage racks as well as the Holtec International storage racks.

The Holtec International spent fuel storage racks are designed to meet all applicable requirements for safe storage of spent fuel and are functionally compatible with the spent fuel pool.

The Holtec Licensing Report has analyzed the consequences of this reracking project by area. In each area (i.e., criticality, seismic, structural, thermal hydraulics, and radiological exposure) design basis margins of safety will be maintained. Installation controls specified in Byron commitments to NUREG-0612 preserve the margins of safety with regard to heavy load restrictions. Compliance with the Byron design limits and procedure adherence will preclude reducing margins of safety.

The margin of safety, for either the Joseph Oat or Holtec International racks, or any combination of the two types of racks, is not reduced as demonstrated by analysis of the seismic, structural, thermal hydraulic, criticality, and radiological aspects of this design change. The Byron design basis spent fuel pool maximum bulk temperature acceptance limit of 140°F has been demonstrated to be preserved by analysis. Criticality calculations show that keff will be maintained within the margin specified above for both the Joseph Oat and the Holtec International racks. The new Holtec International spent fuel pool storage racks have been designed in accordance with the Byron design bases requirements and the NRC OT Position for Review and Acceptance of Spent Fuel Storage and Handling Applications, as amended on January 18, 1979.

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Tracking No. 6H-99-0398
Activity No. Holtec Procedures

Since all aspects of the design change have been demonstrated to be within the existing design bases for Byron and the NRC requirements applicable to spent fuel storage, the proposed changes do not involve a reduction in the margin of safety.

Discussion for Technical Specification 4.3.1 "Criticality"

Section 4.0 of Technical Specifications identifies the design features of certain components. There is no Bases section associated with this Technical Specification section. As a result, corresponding UFSAR section(s) were reviewed.

Similar to the discussion presented above for Technical Specifications Sections 3.7.15 and 3.7.16, the Joseph Oat storage racks need to be operable during and until rack change-out is complete. The Technical Specification needs to address both the requirements for use of the Joseph Oat storage racks as well as the Holtec International storage racks. Upon approval by the NRC of the proposed Technical Specification changes, the UFSAR shall be revised consistent with proposed Technical Specification changes. DRP 8-036 shall control UFSAR changes necessitated as a result of reracking the spent fuel pool.

Since all aspects of the design have been demonstrated to be within the existing design bases for Byron and the NRC requirements applicable to spent fuel storage, the proposed changes do not involve a reduction in the margin of safety.

Discussion for Technical Specification 4.3.3 "Capacity"

Section 4.0 of Technical Specifications identifies the design features of certain components. There is no Bases section associated with this Technical Specification section. As a result, corresponding UFSAR section(s) were reviewed.

For the Holtec International storage racks, a total of 396 storage cells are provided in 4 racks in Region 1 and 2588 storage cells are provided in 20 racks in Region 2 for a total of 2984 storage cells. Increasing the number of available spent fuel storage cells has been determined to have no impact on the margin of safety for spent fuel pool operation. Upon approval by the NRC of the proposed Technical Specification changes, the UFSAR shall be revised consistent with proposed Technical Specification changes. DRP 8-036 shall control UFSAR changes necessitated as a result of reracking the spent fuel pool.

Since all aspects of the design change have been demonstrated to be within the existing design bases for Byron and the NRC requirements applicable to spent fuel storage, the proposed changes do not involve a reduction in the margin of safety.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0407
Activity No. 2BOSR 3.2.7-603A, 2BOSR 3.2.7-609A, and 2BOSR 3.6.5-615A

DESCRIPTION:

The proposed activity revises the referenced Byron Operating Surveillances (BOSR) (ESF relay surveillances) to reflect new contact measurement point locations for newly installed relays. The originally installed Westinghouse relays were replaced with Potter Brumfield relays under DCP 9500072. The Westinghouse relay was no longer available and the replacement relay performs the function as the original relay. The procedure changes are consistent with the design change in that the procedures direct testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the changes in the points where test data is taken under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the changes in the points where test data is taken under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the changes in the points where test data is taken under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0417
Activity No. BOP PS-M1 and BOP PS-M2

DESCRIPTION:

The proposed activity revises Byron Operating Procedures (BOP) PS-M1 and PS-M2 (process sampling (PS) system mechanical valve lineups) to reflect the installation of new valves installed under DCP 9700811. The design change adds pressure indicators and isolation valves to the essential service water (SX) return header. The indicators and new valves will be installed on the non-safety PS system downstream of OSX173A and OSX173B. The procedure changes are consistent with the design change in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the mechanical valve lineup procedures to reflect valves installed under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the mechanical valve lineup procedures to reflect valves installed under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the mechanical valve lineup procedures to reflect valves installed under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-99-0421
Activity No. NSD-EIS-96-001

DESCRIPTION:

The proposed activity reviews Westinghouse procedure NSD-EIS-96-001 used to fabricate the field side connectors for cables in the Control Rod Drive Mechanism (CRDM) and Digital Rod Position Indication (DRPI) systems. These cables are being upgraded under DCPs 9800264, 9800265, 9800266, and 9800267. The procedure review is consistent with the design changes in that the procedure directs installation of the equipment in accordance with the design. Therefore, the procedure review is bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity reviews a Westinghouse procedure used to fabricate connectors for the upgrade of the CRDM and DRPI cables under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity reviews a Westinghouse procedure used to fabricate connectors for the upgrade of the CRDM and DRPI cables under previously evaluated under design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity reviews a Westinghouse procedure used to fabricate connectors for the upgrade of the CRDM and DRPI cables under previously evaluated design changes and does not modify plant equipment. The revision to the procedure does not affect the margin of safety for any Technical Specification.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-00-0023 Revision 1

Activity No.: DCP 9900391, BOP AF-1 Revision 15, BOP AF-7 Revision 18, BOP AF-8 Revision 15, BOP FW-14b Revision 4, and 2BOSR 7.5.3-2 Revision 2

DESCRIPTION:

The 2SX173 valve receives an automatic signal to open when the 2B auxiliary feedwater (AF) pump is started. Once the 2SX173 valve opens, the 2SX178 also opens which creates a flowpath for essential service water (SX) through the jacket water and lube oil heat exchangers and the cubicle cooler for the 2B AF pump room. Due to an out of service on 2SX173, these valves are currently open. The purpose of this temporary modification is to change the logic for 2SX178 such that it receives its open signal directly, rather than being tied to 2SX173 valve position. This will allow the 2SX178 valve to be closed when cooling is not needed in the cubicle and prevent overcooling the 2B AF pump diesel engine. The referenced procedures are being revised to reflect the revised logic for 2SX178.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

This change has no impact on the probability of any accidents or malfunctions. The temporary change allows the 2SX178 valve to be closed when there is no heat load in the 2B AF pump room which does not impact the probability of an accident. The safety function of the 2SX178 valve is to open and the open logic for the valve is simplified from the original design. Therefore, the probability of the valve failing to open is not increased. The consequences of a failure of the 2SX178 valve to open are no different than previously evaluated. All other equipment is unaffected; therefore, the consequences of an equipment malfunction or accident are not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

No new failure types are created by this temporary change. The purpose of this temporary modification is to change the logic for 2SX178 such that it receives its open signal directly rather than being tied to 2SX173 valve position. This will allow the 2SX178 valve to be closed when cooling is not needed in the cubicle and prevent overcooling the 2B AF pump diesel engine. The possibility of a malfunction of a type other than previously evaluated is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

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Safety Evaluation Summary Form

Tracking No. 6G-00-0023 Revision 1

Activity No.: DCP 9900391, BOP AF-1 Revision 15, BOP AF-7 Revision 18, BOP AF-8 Revision 15, BOP FW-14b Revision 4, and 2BOSR 7.5.3-2 Revision 2

The proposed temporary change does not impact the ability of the AF system (Technical Specification 3.7.5) or the SX system (Technical Specification 3.7.8) to perform their intended design functions. The systems will still be fully capable of performing their intended design functions. Therefore, there is no reduction in the margin of safety as described in the bases for the referenced sections of the Technical Specifications.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-00-0165

Activity No. Procedures CC-AA-101, 203, 206, 302, 308, 311, 313 and DRP 9-037

DESCRIPTION:

The referenced procedures are being revised to support transition from the existing Electronic Work Control System (EWCS) to the new Indus Passport Baseline system (PassPort). These procedure revisions will provide the new guidance required to use PassPort, which is the new automated asset management system for Exelon Nuclear. The methodology/terminology changes in these procedures will provide the proper interface between the existing station programs (e.g., Fuse Control Program, EQ Program, etc.) and the new software now being provided to facilitate these programs.

Exelon Nuclear has decided to implement an industry standard automated asset management system and has chosen the Indus PassPort Baseline system to provide this function. EWCS is a highly customized version of PassPort and has proven to be costly to maintain and upgrade. By converting from EWCS to PassPort, Exelon will realize significant cost savings through future updates to the software and functionality.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

This change is administrative in nature and does not impact any design features or adversely affect the ability to achieve and maintain safe shutdown of the plant. Revising the referenced procedures to reflect the change in automated asset management systems from EWCS to PassPort will not impact or change off-site dose nor does it impact any equipment important to safety or affect safe shutdown capability.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The changes to the referenced procedures do not affect any system, structure, or component and therefore cannot create the possibility of an accident or transient of a different type. No new failure modes or malfunctions are introduced.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are impacted by this activity. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0060

Activity No. BOP RH-3, 3T1, 4, M1, M1B, M2, M2B, 1BOSR 5.2.2-1, 2BOSR 5.2.2-1, 1BOSR 6.3.3-1, and 2BOSR 6.3.3-1

DESCRIPTION:

The proposed activity revises the referenced procedures (operating surveillances, operating procedures, and mechanical valve lineups) to modify the position of several valves and to add high point vent valves installed under DCPs 9700022 and 9700023. The proposed changes allow for a more efficient venting of the residual heat removal (RH) system and reduce dose. The procedure changes are consistent with the design changes in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to add high point vent valves under previously evaluated design changes and does not modify plant equipment. Venting functions remain unchanged and the original design intent is maintained. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to add high point vent valves under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to add high point vent valves under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0084
Activity No. BOP AR/PR-1, 2, E4, E5, M1, and M2

DESCRIPTION:

The proposed activity revises the referenced operating procedures (process radiation monitor system monitor startup, shutdown, and mechanical/electrical lineups) to reflect the design changes that reconfigured the steam jet air ejector process radiation monitors (1PR27J and 2PR27J). These design changes were installed under DCP s 9800530 and 9800531. The procedure changes are consistent with the design changes in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the reconfigured 1PR27J and 2PR27J process radiation monitors under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the reconfigured 1PR27J and 2PR27J process radiation monitors under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the reconfigured 1PR27J and 2PR27J process radiation monitors under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-00-0093
Activity No. BAP 1100-3 and BAP 1100-3A3

DESCRIPTION:

The proposed activity revises Byron Administrative procedures (BAP) 1100-3 and 1100-3A3 (plant barrier impairment procedures) to provide the necessary administrative controls for when the removable steel barriers are out of position for equipment handling. The steel barriers, replacing concrete steps, were installed under DCPs 9900048 and 9900049. The procedure changes are consistent with the design changes in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises plant barrier impairment procedures to reflect the installation of the removable steel barriers under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises plant barrier impairment procedures to reflect the installation of the removable steel barriers under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises plant barrier impairment procedures to reflect the installation of the removable steel barriers under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

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Safety Evaluation Summary Form

Tracking No. 6H-00-0096

Activity No. BOP CV-1A, 1B, BOP FP-M1, BOP SX-M1, M2, BOP SX-M1A, M2A, BOP SX-M1C, M2C, 0BOSR 10.c.2-1, 1BOSR 7.8.1-1, 2BOSR 7.8.1-1, 1BOA PRI-7, and 2BOA PRI-7

DESCRIPTION:

The proposed activity revises the referenced procedures to reflect the installation of cross-tie capabilities of fire protection (FP) to essential service water (SX) cooling to provide emergency cooling to the 1A and 2A centrifugal charging (CV) pump coolers in the event of a complete loss of SX cooling. These design changes were installed under DCPs 9900374 and 9900375. The procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the installation of cross-tie capabilities of FP to SX for the 1A and 2A CV pump coolers in the event of a complete loss of SX cooling. These design changes were installed under previously evaluated design changes and the proposed change does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the installation of cross-tie capabilities of FP to SX for the 1A and 2A CV pump coolers in the event of a complete loss of SX cooling. These design changes were installed under previously evaluated design changes and the proposed change does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the installation of cross-tie capabilities of FP to SX for the 1A and 2A CV pump coolers in the

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Safety Evaluation Summary Form

Tracking No. 6H-00-0096

Activity No. BOP CV-1A, 1B, BOP FP-M1, BOP SX-M1, M2, BOP SX-M1A, M2A, BOP SX-M1C, M2C, 0BOSR 10.c.2-1, 1BOSR 7.8.1-1, 2BOSR 7.8.1-1, 1BOA PRI-7, and 2BOA PRI-7

event of a complete loss of SX cooling. These design changes were installed under previously evaluated design changes and the proposed change does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-00-0099

Activity No. BAR 1-19-A5, 2-19-A5, 1-20-A3, 2-20-A3, 1-20-A4, and 2-20-A4

DESCRIPTION:

The proposed activity revises the referenced Byron Annunciator Response (BAR) procedures to reflect the installation of eight new CO2 high speed overcurrent relays and twenty new auxiliary current transformers in new non-safety related panels 1/2PA47J and two auxiliary current transformers in existing panels 1/2PM01J and 1/2PA23J. This equipment, installed under DCPs 9900026 and 9900027, enhanced the existing protective relay scheme for the System Auxiliary Transformers and the Unit Auxiliary Transformers. The procedure changes are consistent with the design changes in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced BAR procedures to reflect the installation of new relays and current transformers to enhance existing transformer protective relay schemes. These design changes were installed under previously evaluated design changes and the proposed change does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced BAR procedures to reflect the installation of new relays and current transformers to enhance existing transformer protective relay schemes. These design changes were installed under previously evaluated design changes and the proposed change does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced BAR procedures to reflect the installation of new relays and current transformers to enhance existing transformer protective relay schemes. These design changes were installed under previously

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0099

Activity No. BAR 1-19-A5, 2-19-A5, 1-20-A3, 2-20-A3, 1-20-A4, and 2-20-A4

evaluated design changes and the proposed change does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0107
Activity No. BOP AR/PR-M2

DESCRIPTION:

The proposed activity revises Byron Operating Procedure BOP AR-PR-M2 (mechanical valve lineup) to reflect revised valve descriptions and valve lineups for process radiation monitor 2PR27J. DCP 9800531 reconfigured the 2PR27J process radiation monitor. The procedure change is consistent with the design change in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises BOP AR/PR-M2 to reflect valve descriptions and valve lineups under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises BOP AR/PR-M2 to reflect valve descriptions and valve lineups under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises BOP AR/PR-M2 to reflect valve descriptions and valve lineups under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0112
Activity No. BOP GS-1, 2, E2, M2, 2BOA SEC-3, and 2BOA SEC-4

DESCRIPTION:

The proposed activity revises the referenced procedures to reflect the installation of a second set of high pressure gland steam spillover lines from the high pressure turbine rotor gland seals to the condenser under DCP 9900423. The procedure changes are consistent with the design change in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the installation of a second set of high pressure gland steam spillover lines from the high pressure turbine rotor gland seals to the condenser. This design change was installed under a previously evaluated design change and the proposed change does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the installation of a second set of high pressure gland steam spillover lines from the high pressure turbine rotor gland seals to the condenser. This design change was installed under a previously evaluated design change and the proposed change does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the installation of a second set of high pressure gland steam spillover lines from the high pressure turbine rotor gland seals to the condenser. This design change was installed under a previously evaluated design change and the proposed change does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0123
Activity No. BFP FH-14 Series

DESCRIPTION:

The proposed activity is revision to the BFP FH-14 procedure series (fuel handling procedures) to incorporate changes made in DCPs 9900454 and 9900455. These procedure changes describe the operation of the changed equipment and ensure proper testing of the changed equipment. These procedure changes are consistent with the facility changes; therefore, the original evaluations for the facility changes encompass the changes to these procedures.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises fuel handling procedures to reflect changes installed under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises fuel handling procedures to reflect changes installed under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises fuel handling procedures to reflect changes installed under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0131
Activity No. BOP FW-20

DESCRIPTION:

The proposed change revises Byron Operating Procedure (BOP) FW-20 (feedwater system drain) to reflect the replacement of the 1/2FW079A-D check valves with an improved model installed under DCPs 9900378 and 9900379. The procedure change involves is the removal of editorial information that will no longer apply once the referenced DCPs are completed. The procedure change is consistent with the design changes in that the procedure directs operation of the equipment in accordance with the design. Therefore, the procedure change is bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises BOP FW-20 to remove information no longer applicable under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises BOP FW-20 to remove information no longer applicable under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises BOP FW-20 to remove information no longer applicable under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0133

Activity No. BOP RH-M2A, 1BOA S/D-2, 2BOA S/D-2, 1BOA PRI-10, and 2BOA PRI-10

DESCRIPTION:

The proposed activity revises Byron Abnormal Operating Procedures (BOA) 1BOA S/D-2, 2BOA S/D-2, 1BOA PRI-10, and 2BOA PRI-10 and Byron Operating Procedure (BOP) RH-M2A to reflect changes in valves, valve numbers, and locations that were affected by the incorporation of DCPs 9700022 and 9700023. The procedure changes are consistent with the design changes in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect changes in valves, valve numbers, and locations under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect changes in valves, valve numbers, and locations under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect changes in valves, valve numbers, and locations under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0140

Activity No. BAR 1-18-B2, 2-18-B2, 1-18-E12, 2-18-E12, BOP TG-E1, TG-E2, 1BOL 3.g, and 2BOL 3.g

DESCRIPTION:

The proposed activity revises the referenced procedures to reflect changes in the main turbine trip logic that were installed under DCPs 9700022 and 9700023. The procedure changes are consistent with the design changes in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect changes in the main turbine trip logic under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect changes in the main turbine trip logic under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect changes in the main turbine trip logic under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0141

Activity No. BAR 1-18-B4, 2-18-B4, 1-18-C2, 2-18-C2, 1-19-C2, 2-19-C2, BOP MS-1, MS-2, TO-M1, and M2

DESCRIPTION:

The proposed activity revises the referenced procedures to reflect a change in main turbine pressure switch trip logic installed under DCPs 9900384 and 9900385. The procedure changes are consistent with the design change in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect a change in main turbine pressure switch trip logic under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect a change in main turbine pressure switch trip logic under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect a change in main turbine pressure switch trip logic under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-00-0170
Activity No. BVP 900-23 and BVP 900-24

DESCRIPTION:

The proposed activity implements new procedures that will check for air in-leakage into the Unit 1 and Unit 2 steam generator blowdown (SD) systems. The proposed activity was performed in the past as SPP 99-029. The proposed activity is to convert the SPP to permanent station procedures, BVP 900-23 and BVP 900-24, for Unit 1 and Unit 2, respectively.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity temporarily secures steam generator blowdown using station procedures. Steam generator chemistry is verified within specified limits prior to securing blowdown. The ability of the SD system to isolate in the event of a containment isolation signal is not impaired. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The blowdown flow path will not be secured long enough to cause chemistry to exceed specified limits. If specified chemistry limits are approached, the proposed activity will restore the normal blowdown flow path. The ability of the SD system to isolate in the event of a containment isolation signal is not impaired. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The steam generator blowdown system containment isolation valves remain operable during the proposed activity. The proposed activity closes these valves to facilitate identification of the leaking blowdown flow path. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0174
Activity No. MRS-SSP-1111-CAE-LTA, Revision 0 - Byron Fuel Inspection Field
Procedure - Field Change 1
SAE-RRS-FP-48(84), Revision 2 - XY Visual Inspection Plate Field Procedure
MRS-GEN-1051-OP, Revision 0 - Fuel Rod Gamma Scanner Operating Procedure

DESCRIPTION:

The proposed procedures perform activities associated with the Byron Lead Test Assembly (LTA) Inspection project. The field change provides the steps and sequence when to perform the gamma-scan and low mag visuals during the LTA project. The cell sizing steps are not intended to be performed on the LTAs and are being removed. The additional procedures (low mag TV visual inspection and gamma-scanning) provide the set up and instructions for these inspections. These activities were identified and evaluated previously although the final procedure packages were not available for the initial review.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The probability of occurrence or the consequences of an accident previously evaluated in the safety analysis report (SAR) are not increased during the proposed activities. The current fuel handling accident analysis bounds any event that could arise during the proposed activity. The equipment important to safety for the fuel handling accident outside containment is the fuel handling building exhaust filtration system. Since the filters and associated equipment are not affected, the consequences evaluated in the SAR for fuel handling accident will not increase due to malfunction of equipment important to safety.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity does not alter any operational or postulated accident condition loadings or change any postulated accident initiating or mitigating conditions. The utilization of these procedures does not create any new limiting single failures. The possibility of fuel failures resulting from equipment catastrophic failures or misuse are not new modes of failure and are bounded under the current safety analysis assumptions. All original design criteria continue to be met such that the ability of any safety related equipment to perform their intended safety function is not affected.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0174
Activity No. MRS-SSP-1111-CAE-LTA, Revision 0 - Byron Fuel Inspection Field
Procedure - Field Change 1
SAE-RRS-FP-48(84), Revision 2 - XY Visual Inspection Plate Field Procedure
MRS-GEN-1051-OP, Revision 0 - Fuel Rod Gamma Scanner Operating Procedure

The margin of safety, as defined in the basis for any Technical Specification, is not reduced because the inspection activities of the LTAs or related assemblies do not affect any parameters upon which Technical Specifications are based.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0177

Activity No. Procedure Changes for Technical Requirements Manual (TRM) Revision to Sections 3.1.g and 3.1.k

DESCRIPTION:

The proposed change revises various procedures so they remain consistent with changes to Technical Requirements Manual (TRM) Sections 3.1.g and 3.1.k. The procedures undergoing revision are BAR 1-10-C6, BAR 2-10-C6, BAR 1-10-D6, BAR 2-10-D6, 1BOSR 1.k.1-1, 2BOSR 1.k.1-1, 1BOSR 1.k.2-1, 2BOSR 1.k.2-1, 1BOL 1.g, 2BOL 1.g, 1BOL 1.k, and 2BOL 1.k. The TRM change revised the Actions of TRM Limiting Conditions of Operation (TLCO) 3.1.g, "Position Indication System – Shutdown," and TLCO 3.1.k, "Position Indication System – Shutdown (Special Test Exception)." The changes include 1) providing a restoration time of 15 minutes when the required Digital Rod Position Indication (DRPI) is inoperable in Modes 3, 4, and 5 and 2) providing comparable alternate Actions in lieu of opening the Reactor Trip Breakers (RTBs) and Reactor Trip Bypass Breakers (RTBBs), i.e., initiate action to fully insert all rods or initiate boration to restore the Reactor Coolant System boron concentration to within the limits specified in the Core Operating Limits Report.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect changes to TRM Sections 3.1.g and 3.1.k previously evaluated under an evaluation and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect changes to TRM Sections 3.1.g and 3.1.k previously evaluated under an evaluation and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect changes to TRM Sections 3.1.g and 3.1.k previously evaluated under an evaluation and does

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0177

Activity No. Procedure Changes for Technical Requirements Manual (TRM) Revision to
Sections 3.1.g and 3.1.k

not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6H-00-0189

Activity No. BOP FP-12, BOP FP-13, BOP FP-M1, 0BOSR FP-A1, 0BOSR FP-Q1, BAR
1PM09J-B19, 0BVSR FP-10 and 0BVSR FP-7

DESCRIPTION:

The proposed activity revises the referenced procedures (operating procedures, operating and engineering surveillances, and annunciator response procedures) to reflect the abandonment of the fire protection (FP) foam system to the outside diesel oil storage tanks under DCP 9900604. The procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the reflect the abandonment of the FP foam system to the outside diesel oil storage tanks under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the reflect the abandonment of the FP foam system to the outside diesel oil storage tanks under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the reflect the abandonment of the FP foam system to the outside diesel oil storage tanks under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

PEPP-E FORM

Safety Evaluation Summary Form

Tracking No. 6G-01-0011
Activity No. 2BVSR XPT-23 and 2BVSR XPT-3

DESCRIPTION:

The proposed procedure revisions revise the rod worth uncertainty acceptance criterion currently being utilized in the rod worth measurement startup procedures 2BVSR XPT-23 and 2BVSR XPT-3 from 10% to 7% corresponding to a change in the procedure's review criterion of 5.6%. The proposed change will also update the UFSAR accordingly.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The rod worth uncertainty change and associated UFSAR changes do not involve an increase in the probability of occurrence of an accident previously evaluated in the safety analysis report. Rod worth uncertainty is not an input to the safety analysis for any of the events identified. However, shutdown margin (SDM) will be maintained for each mode of operation consistent with the safety analysis assumptions presented in the UFSAR. Appropriate procedures will be followed to measure rod worth and to perform the SDM safety analysis calculations as part of the reload analysis.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The change in rod worth uncertainty from 10% to 7% and associated UFSAR changes will not affect any safety parameter. All design and performance criteria, including SDM, will continue to be met and no new failure modes or limiting single failure mechanisms will be created. The core will not operate in excess of pertinent design basis operating limits for safety parameters. The adherence to these standards and criteria precludes new risks to components and systems that could introduce a new type of accident.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The affected sections of the Technical Specifications and Technical Requirements Manual were reviewed to determine the impact of the rod worth uncertainty change or associated UFSAR changes on the acceptance limits and margin of safety. There is no mention of rod worth uncertainty in the Technical Specification Bases. Operation will continue to be analyzed in accordance with approved methodologies. The rod worth measurement procedures will be consistent with

Safety Evaluation Summary Form

Tracking No. 6G-01-0011
Activity No. 2BVSR XPT-23 and 2BVSR XPT-3

the rod worth uncertainty assumption used in the SDM reload safety analysis calculation. SDM will continue to be met in all modes of operation.

50.59 REVIEW COVERSHEET FORM

50.59 Evaluation No.: 6G-01-0027

Station: Byron

Activity/Document Number: BAP 1100-3A3

Revision Number: 7

Title: Revision to BAP 1100-3A3

Description of Activity:

The proposed activity performs the following:

- (1) Adds the following barriers to BAP 1100-3A3, Pre-evaluated Plant Barrier Matrix, including appropriate compensatory actions to be taken when these barriers are impaired:
 - Local Leak Rate Test (LLRT) floor penetrations 4467, 4739, 5793, 5960, 8531, and 8634
 - Wall penetrations #2672, 2673, 2674, and 2675
 - Transom penetrations above doors 0DSD269, 278, 341, and 346
 - Floor plugs 1/2DSP377, 378, 379 for the 1/2 A/B Excess Letdown Heat Exchangers and 1/2 A/B Regeneration Heat Exchangers respectively;
 - Containment Sump Isolation Valve Assembly (1/28811A/B)
 - Relief valves for the Auxiliary Building, Control Room, Containment, Boron Thermal Regeneration, Radwaste Control Room, QA Vault, and Service Building Chillers
 - Auxiliary Building non-contaminated drain header access plugs
 - Steam Generator Safety Valves and Power Operated Relief Valves
 - Diesel-driven Auxiliary Feedwater Pump Intake and Exhaust Piping
- (2) Deletes the following office doors in the Service Building: 0DSD026, 0DSD027, 0DSD028, 0DSD053, 0DSD130, 0DSD136, 0DSD137, 0DSD138, 0DSD762, 0DSD766, and 0DSD767 (deleted under DCR 990631).

Reason for Activity:

The barriers being added are impaired relatively routinely (during outages or for maintenance). Currently, the compensatory measures (if any) required while these barriers are impaired are determined on a case-by-case basis each time they are impaired. Documenting the appropriate compensatory actions once saves engineering effort. The doors being removed are located in the Service Building. These are office doors that have been eliminated due to remodeling of the office space.

Effect of activity:

The effect of this activity is to determine, for each barrier being added, the appropriate compensatory actions and proceduralize them for the use of the maintenance departments. The effect of this activity for the barriers being deleted is to remove them from the Plant Barrier Impairment (PBI) program.

Summary of Conclusion for the Activities 50.59 Review:

The barriers being added to this procedure have been reviewed for the impact of barrier degradation on systems and functions to ensure that the plant is maintained within the design basis as evaluated in the UFSAR, thereby ensuring that the probabilities and consequences of equipment malfunction/accidents remain unchanged. Appropriate compensatory actions have been evaluated and are required to either maintain the plant within its design basis during a postulated event or to return the plant to within its design basis before the barrier can be challenged. Otherwise, the equipment is declared inoperable and the applicable Technical Specification Action is entered. In accordance with procedure CC-AA-201, Plant

50.59 REVIEW COVERSHEET FORM**50.59 Evaluation No.:** 6G-01-0027

Barrier Impairments, if personnel are expected to perform actions to compensate for a degraded barrier they must be dedicated to the action (no other duties), equipment must be readily available, and the action must be capable of being performed before the barrier is challenged. The barriers being deleted have no design criteria requirements and are located in the non-safety related, non-regulatory related Service Building.

This activity does not result in exceeding or altering the design basis limit of any fission product barriers nor does it involve changes to any methodology used in establishing the design bases or safety analyses.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.		Rev. _____
<input checked="" type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.	<u>6G-01-0027</u>	Rev. <u>0</u>
<input type="checkbox"/>	50.59 Validation	50.59 Validation No.		Rev. _____

Safety Evaluation Summary Form

Tracking No. 6H-01-0002 Revision 1

Activity No. BCA, BEP, BGP, BOA, BOL, BOSR, BOP, and BAR Procedures for DCP 9900266 and DCP 9900267)

DESCRIPTION:

The purpose of this activity is to revise various procedures (86) to reflect the installation of DCP 9900266 and DCP 9900267. These procedures include emergency operating procedures (BCA, BEP, and BOA), surveillances (BOSR), Technical Specification Action Requirement procedures (BOL), general operating procedures (BGP), operating procedures (BOP), and annunciator response procedures (BAR). The design changes replaced the automatic boron dilution prevention system (BDPS) with alarms, indicators, procedures, and controls. When alerted by one or more of these alarms during plant Modes 3, 4, or 5, operations personnel will be instructed to take administrative action to procedurally align the reactor vessel to the refueling water storage tank to borate and prevent the core from going critical. The procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the procedures to reflect the changes in BDPS operation installed under previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the procedures to reflect the changes in BDPS operation installed under previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the procedures to reflect the changes in BDPS operation installed under previously evaluated design change and does not modify

Safety Evaluation Summary Form

Tracking No. 6H-01-0002 Revision 1
Activity No. BCA, BEP, BGP, BOA, BOL, BOSR, BOP, and BAR Procedures for DCP
9900266 and DCP 9900267)

plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-01-0006

Activity No. BAR 1PM09J-D18, BAR 2PM09J-C19, BOP CV-1A, 1B, FP-M1, SX-M1, M2, M1B, M2B, 0BOSR 10.c.2-1, 1BOSR 7.8.1-1, 2BOSR 7.8.1-1, 1BOA PRI-7, and 2BOA PRI-7

DESCRIPTION:

The purpose of this activity is to revise the referenced procedures to reflect the installation of DCP 9900553 and DCP 9900554. These procedures include emergency operating procedures (BOA), surveillances (BOSR), operating procedures (BOP), and annunciator response procedures (BAR). The proposed activity provides emergency cooling capabilities for the Unit 1B and Unit 2B centrifugal charging (CV) pump coolers by connecting a hose from the fire protection (FP) system to the essential service water (SX) piping at the respective CV pump. The procedure changes are consistent with the design changes in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the referenced procedures to reflect the installation of a fire protection (FP) to essential service water (SX) cooling supply to the centrifugal charging (CV) pumps installed under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the referenced procedures to reflect the installation of a FP to SX cooling supply to CV pumps installed under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the referenced procedures to reflect the installation of a FP to SX cooling supply to CV pumps installed under previously evaluated

Safety Evaluation Summary Form

Tracking No. 6H-01-0006

Activity No. BAR 1PM09J-D18, BAR 2PM09J-C19, BOP CV-1A, 1B, FP-M1, SX-M1, M2,
M1B, M2B, 0BOSR 10.c.2-1, 1BOSR 7.8.1-1, 2BOSR 7.8.1-1, 1BOA PRI-7, and
2BOA PRI-7

design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-01-0007

Activity No. CC-AA-101, 104, 203, 206, 302, 308, 311, and 313

DESCRIPTION:

The proposed activity revises the referenced procedures to support transition from the existing Electronic Work Control System (EWCS) to the new Indus PassPort Baseline system (PassPort). These procedure revisions will provide the new guidance required to use PassPort which is the new automated asset management system for Exelon Nuclear. The methodology/terminology changes in these procedures will provide the proper interface between the existing station programs and the new software now being provided to facilitate these programs. Exelon Nuclear has decided to implement an industry standard automated asset management system and has chosen the Indus PassPort Baseline system to provide this function. EWCS is a highly customized version of PassPort and has proven to be costly to maintain and upgrade. The procedure changes are consistent with a previously performed evaluation on similar procedures. Therefore, the procedure changes are bounded by the previous evaluation performed for similar procedures.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

This change is administrative in nature and does not impact any design features or adversely affect the ability to achieve and maintain safe shutdown of the plant. Revising the referenced procedures to reflect the change in automated asset management systems from EWCS to PassPort will not impact or change offsite dose, impact any equipment important to safety, or affect safe shutdown capability.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The changes to the referenced procedures do not affect any system, structure or component and therefore, cannot create the possibility of an accident or transient of a different type. No new failure modes or malfunctions are introduced by this activity.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

No Technical Specifications are impacted by this activity. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-01-0010
Activity No. MA-AP-EM-6-00605

DESCRIPTION:

The proposed activity implements procedure MA-AP-EM-6-00605 Revision 1, "125 VDC ESF Battery Cell Jumpering".

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

Implementation of MA-AP-EM-6-00605 Revision 1 permits a defective battery cell to be removed from service while retaining all the required functions of the 125 VDC battery bank. The battery bank will function as assumed in the safety analysis. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

Implementation of MA-AP-EM-6-00605 Revision 1 does not alter the function of the ESF battery which retains the capability of satisfying all safety analysis assumptions. The procedure utilizes normal battery maintenance techniques to jumper a single defective cell in the multi-cell ESF battery bank while retaining the capability of the battery bank to function if required. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

Jumpering a defective individual battery cell in a multi-cell ESF battery bank permits restoration of the ESF battery bank to operable status as required by Technical Specifications. Implementation of MA-AP-EM-6-00605 Revision 1 does not affect the margin of safety as defined in the Technical Specifications.

Safety Evaluation Summary Form

Tracking No. 6H-01-0030
Activity No. 2BVSR 5.2.4-5 and 2BVSR 5.2.4-6

DESCRIPTION:

The proposed activity revises surveillances 2BVSR 5.2.4-5 and 2BVSR 5.2.4-6 (centrifugal charging pump ASME surveillances) to reflect the installation of flow elements and flow indicators under DCP 9700729 and DCP 9700730. The references to personnel qualifications with regard to previously utilized instrumentation, steps regarding limitations of previously utilized instrumentation, and instructions for the use of previously utilized instrumentation are being deleted. In addition, the previously installed instrumentation nomenclature (2FE-CV047) is being replaced with the currently installed instrumentation nomenclature (2FI-CV047). The procedure changes are consistent with the design changes in that the procedures direct testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluations performed for the design changes.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the procedures to reflect the installation of flow elements and indicators installed under previously evaluated design changes and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the procedures to reflect the installation of flow elements and indicators installed under previously evaluated design changes and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the procedures to reflect the installation of flow elements and indicators installed under previously evaluated design changes and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

Safety Evaluation Summary Form

Tracking No. 6H-01-0031

Activity No. BOSR, BGP, BAR, and BOP Procedures for DCP 9900317

DESCRIPTION:

The purpose of this activity is to revise various procedures to reflect the installation of DCP 9900317. These procedures include surveillances (BOSR), general operating procedures (BGP), operating procedures (BOP), and annunciator response procedures (BAR). DCP 9900317 changed the coincidence and logic for feedwater isolation and main feedwater pump recirculation valve actuation. The procedure changes include coincidence and logic for feedwater isolation and main feedwater pump recirculation valve actuation and also address the changes required for testing the logic changes. The procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

SAFETY EVALUATION SUMMARY:

1. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because:

The proposed activity revises the procedures to reflect the changes in coincidence and logic installed under a previously evaluated design change and does not modify plant equipment. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created because:

The proposed activity revises the procedures to reflect the changes in coincidence and logic installed under a previously evaluated design change and does not modify plant equipment. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because:

The proposed activity revises the procedures to reflect the changes in coincidence and logic installed under a previously evaluated design change and does not modify plant equipment. Therefore, the margin of safety, as defined in the basis for any Technical Specification, is not reduced.

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Activity/Document Number: BOP IA-14

Revision Number: 0

Title: Station Instrument Air Backup Supply to Containment

Description of Activity:

The proposed activity creates a new procedure to provide instrument air (IA) jumper hoses that can bypass the normal instrument air supply penetration to Unit 1 and Unit 2 containments to allow maintenance on that penetration during an outage. Installation can be through the main air lock or equipment hatch or through a spare penetration. This procedure provides for installation and removal of the jumper hoses.

Reason for Activity:

The proposed activity allows uninterrupted supply of IA to containment during refueling outages.

Effect of Activity:

There is no effect on containment isolation since the procedure is only performed in Modes 5 or 6 when containment integrity is not required and when the normal source of IA is not available or needs to be supplemented.

Summary of Conclusion for the Activities 50.59 Review:

This procedure utilizes the design installed under DCP 9900853. This design is a passive extension of the IA system. A break or breach in the pressure boundary of this new design does not represent a new failure mode for the IA system. In addition, design considerations and operating restrictions prevent adversely impacting interfacing safety related equipment.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if multiple discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.	<u> </u>	Rev. <u> </u>
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.	<u> </u>	Rev. <u> </u>
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	<u>6H-01-0046</u>	Rev. <u>0</u>

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Activity/Document Number: BOP FW and BOP WG Procedure Revisions

Revision Number: 0

Title: BOP FW and BOP WG Procedure Revisions

Description of Activity:

The purpose of this activity is to revise various procedures to reflect the installation of DCP 9800540. DCP 9800540 made several changes to gland water (WG) and feedwater (FW) piping near the main feedwater pumps. The revised procedures include BOP FW-19 (new procedure), BOP FW-19a and BOP FW-19b (delete procedures), BOP FW-24 (new procedure), BOP FW-24a and BOP FW-24b (delete procedures), BOP FW-M2, and BOP WG-M2. The proposed activity combines BOP FW-19a (Unit 2) and BOP FW-19b (Unit 2), and BOP FW-24a and BOP FW-24b to BOP FW-19 and BOP FW-24 respectfully to incorporate valve and operational changes as a result of DCP 9800540. The changes in BOP FW-M2 and BOP WG-M2 incorporate newly installed valves into the valve lineup sheets.

Reason for Activity:

BOP FW-19 and BOP FW-24 (FW procedures applicable to Units 1 and 2) were separated into BOP FW-19a and BOP FW-24a (Unit 1) and BOP FW-19b and BOP FW-24b (Unit 2) as a result of DCP 9800539, the Unit 1 DCP to accomplish the same modification on Unit 1 as DCP 9800540 performs on Unit 2.

Effect of Activity:

In this instance, Unit 1 and Unit 2 procedures will be combined to meet existing "compatible" procedure usage experienced at Byron to reduce the overall population of Byron procedures and provide procedure consistency. Unit specific procedures being deleted and a common procedure for the installation of the design change on both Unit 1 and Unit 2 will be implemented.

Summary of Conclusion for the Activities 50.59 Review:

The procedure changes are consistent with the design change in that the procedures direct operation of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change. The proposed procedure changes do not modify plant equipment and implement a previously reviewed design change; therefore, accident analyses are not affected and no new accidents are created.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if multiple discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.		Rev.
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.		Rev.
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	6H-01-0049	Rev. 0

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Station:Byron

Activity/Document Number: BAP 1100-3A3

Revision Number:8

Title: Revision to BAP 1100-3A3, Pre-Evaluated Plant Barrier Matrix

Description of Activity:

The proposed activity will revise BAP 1100-3A3, Pre-Evaluated Barrier Matrix, as follows:

- 1) Add the following barriers including appropriate compensatory actions to be taken when these barriers are impaired:
 - Door ODSD856, Women Change Area door
- 2) Remove the high energy line break (HELB) discipline from door ODSD453 and replace it with HELB compensatory action H10 for doors ODSD449 and ODSD452 and similarly remove the HELB discipline from door ODSD411 and replace it with HELB compensatory action H11 for doors ODSD412 and ODSD413. Revise compensatory actions H10 and H11 to provide the proper compensatory actions for doors ODSD449/452 and ODSD412/413 respectively.
- 3) Change the HELB compensatory action for doors ODSD325 and ODSD815 from H10 to H2.
- 4) Change the first "OWO5145B" to "OWO5145A."
- 5)
 - a. Delete the non-Technical Requirements Manual (TRM) fire discipline for doors ODSSD009, ODSSD010, ODSD011, ODSD012,
 - b. Delete the non-TRM fire discipline for doors ODSD771, ODSD935, and ODSD937
 - c. Change the TRM fire discipline to non-TRM fire discipline for doors ODSD552 and ODSD561.
- 6) Add/corrected various door locations/descriptions.

Reason for Activity:

The barriers and the compensatory measures being added may be impaired relatively routinely during outage and maintenance activities. Currently, the compensatory measures (if any) required while these barriers are impaired are determined on a case-by-case basis each time they are impaired. Documenting the appropriate compensatory measures once saves engineering effort. Specific reasons for each group are as follows:

- 1) The Womens Change Area door was not on the list and is being added.
- 2) The HELB barrier boundary is being moved back from doors ODSD453 and ODSD411 to doors ODSD449/452 and ODSD412/413 respectively per NDI BYR-2001-035. Doors ODSD453 and ODSD411 then provide the compensatory HELB barrier.
- 3) Although the access control facility may provide an adequate HELB barrier with respect to steam pressure, it has been determined that it is too close to the Unit 2 main steam piping and therefore cannot be assumed to remain intact following main steam line pipe whip. Therefore, a compensatory temporary HELB is required.
- 4) Typographical error.
- 5)
 - a. Changes to fire doors in accordance with FDRP 20-014.
 - b. These doors have been determined to not meet the TRM definition of a fire rated assembly: "Fire rated

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assemblies separating safety related fire areas or separating portions of redundant systems important to safe shutdown within a fire area." These 3 hour fire rated doors separating the out-of-doors from the access to the containment emergency personnel hatch do not fall within the TRM definition of a fire rated assembly. The containment building is a designated fire area, however the out-of-doors is not a fire area. There is no safe shutdown equipment out-of-doors in the immediate vicinity of the containment building. Therefore, the door does not separate safety-related fire areas or redundant safe shutdown equipment. For this reason, the containment building walls are not fire rated. All the personnel access areas next to the main and system auxiliary transformers are provided with fire rated doors. This was done to protect any persons trapped in these areas by a transformer fire.

- c. These doors were incorrectly identified as non-TRM fire doors. They are located in the warehouse which does not contain any fire barriers.

6) Locations/descriptions were missing/incorrect.

Effect of Activity:

The effect of this activity is to provide correct, appropriate and conservative compensatory actions for each barrier on the matrix to ensure that plant systems are adequately protected from plant hazards, and to proceduralize these compensatory actions for the use of the maintenance and operating departments such that additional Engineering support is minimized.

Summary of Conclusion for the Activities 50.59 Review:

The barriers being added or changed in this procedure have been reviewed for the impact of barrier degradation on systems and functions to ensure the plant is maintained within the design basis as evaluated in the UFSAR, thereby ensuring that the probabilities and consequences of equipment malfunction/accidents remain unchanged. Appropriate compensatory actions have been evaluated and are required to either maintain the plant within its design basis during a postulated event or to return the plant to within its design basis before the barrier can be challenged. Otherwise, the equipment is declared inoperable and the applicable Technical Specification Action is entered. In accordance with CC-AA-201, Plant Barrier Impairments, if personnel are expected to perform actions to compensate for a degraded barrier they must be dedicated to the action (no other duties), equipment must be readily available, and the action must be capable of being performed before the barrier is challenged. This activity does not result in exceeding or altering the design basis limit for any fission product barriers and does not involve changes to any methodology used in establishing the design bases or safety analyses.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if multiple discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.		Rev. _____
<input checked="" type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.	6G-02-0005	Rev. 0
<input type="checkbox"/>	50.59 Validation	50.59 Validation No.		Rev. _____

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Station:Byron

Activity/Document Number: BAP 1100-3A3

Revision Number:2

Title: Revision to BAP 1100-3A3, Pre-Evaluated Plant Barrier Matrix

Description of Activity:

The proposed activity will revise BAP 1100-3A3, Pre-Evaluated Plant Barrier Matrix, as follows:

- 1) Add the following barriers including appropriate compensatory actions to be taken when these barriers are impaired:
 - a) OSX169A/B, C/D, E/F, SX makeup vacuum breaker valve enclosures
 - b) Unit 1 and 2 auxiliary building ventilation (VA) supply fan plenum inner and outer doors (Compensatory Action VA10)
 - c) Unit 1 and 2 spare containment penetrations 1/2PC063M, 1/2PC064M, 1/2PC074M (Compensatory Action VA11)
- 2) Revised Compensatory Action H8 to change backup high energy line break (HELB) doors.
- 3) Delete door 0DSD760
- 4) Add door 0DSD763-1
- 5) Add non-Technical Requirements Manual (TRM) fire discipline to doors 0DSD004-SHOP, 0DSD005-SHOP, 0DSD006-SHOP, 0DSD011-SHOP, 0DSD012-SHOP, 0DSD014-SHOP, and 0DSD015-SHOP.
- 6) Minor editorial equipment name and location changes.

Reason for Activity:

The barriers and compensatory measures being added may be impaired relatively routinely during outage and maintenance activities. Currently, the compensatory measures (if any) required while these barriers are impaired are determined on a case-by-case basis each time they are impaired. Documenting the appropriate compensatory measures once saves engineering effort. Specific reasons for each group are as follows:

- 1) a) Added the SX makeup vacuum breaker valve enclosures at Maintenance's request.
 - b) Added Unit 1 and 2 VA supply fan plenum inner outer doors at Maintenance's request.
 - c) Added Unit 1 and 2 spare containment penetrations at Maintenance's request.
- 2) Provide equal backup HELB protection with less impact on Chemistry department day-to-day work.
- 3) Door no longer exists.
- 4) Door exists, but was never added to the matrix.
- 5) Doors are non-TRM fire doors, and should have been shown as such on the matrix.
- 6) Correct minor nomenclature and location errors.

Effect of Activity:

The effect of this activity is to provide correct, appropriate and conservative compensatory actions for each barrier on the matrix to ensure that plant systems are adequately protected from plant hazards, and to proceduralize these compensatory actions for the use of the maintenance and operating departments such that additional Engineering support is minimized.

Summary of Conclusion for the Activities 50.59 Review:

The addition/changes/deletions for these barriers do not introduce the possibility of a change in the frequency of an accident because none of these barriers are initiators of any accident or malfunctions. The addition/changes/deletions for these barriers do not introduce the possibility of a change in the consequences of an accident because appropriate compensatory actions are required to either maintain the plant within its design basis during a postulated event, or return the plant to within its design basis before the barrier can be challenged.

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Appropriate compensatory actions have been evaluated and are required to either maintain the plant within its design basis during a postulated event, or to return the plant to within its design basis before the barrier can be challenged. Otherwise, the equipment is declared inoperable and the applicable Technical Specification Action is entered. In accordance with CC-AA-201, Plant Barrier Impairments, if personnel are expected to perform actions to compensate for a degraded barrier they must be dedicated to the action (no other duties), equipment must be readily available, and the action must be capable of being performed before the barrier is challenged. Therefore, this activity will not create the possibility of a malfunction of a system, structure, or component important to safety with a different result, or with increased consequences of a malfunction of any equipment important to safety, or create the possibility of an accident of a different type, than those previously evaluated in the UFSAR. This activity does not result in exceeding or altering the design basis limit for any fission product barriers, nor does it involve changes to any methodology used in establishing the design bases or safety analyses.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if multiple discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.		Rev. _____
<input checked="" type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.	6G-02-0008	Rev. 0
<input type="checkbox"/>	50.59 Validation	50.59 Validation No.		Rev. _____

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50.59 Validation No.: 6H-02-0001

Station: Byron

Activity/Document Number: 1BVSr 3.1.11-1, 1BVSr 3.1.11-2, 1BVSr 3.1.11-3, 1BVSr 9.3.2-1, 1BVSr XPT-3, 1BVSr XPT-4, 1BVSr XPT-6, 1BVSr XPT-11, 1BVSr XPT-12, 1BVSr XPT-14, 1BVSr XPT-18, 1BVSr XPT-22, 1BVSr XPT-23, 1BVSr XPT-24, SPP 01-018

Revision Number: 0

Title: Procedure Revisions for DCP 9800195

Description of Activity:

The proposed activity will update the referenced procedures to reflect the installation of DCP 9800195. This activity involves the deletion of procedures no longer applicable and the revision/creation of procedures to operate or test the new equipment. DCP 9800195 replaced the Westinghouse source range (SR) and intermediate range (IR) drawers in the main control room with SR and IR drawers provided by Gamma-Metrics (GM). The new GM drawers receive their signal input from existing GM detectors.

Reason for Activity:

These procedures are updated out of necessity due to the plant modification. The reason for the modification was to improve the system performance, most notably a decrease in electrical noise susceptibility in the SR channels.

Effect of activity:

The effect of updating these procedures in association with the implementation of DCP 9800195 will be that the equipment will operate in a manner consistent with its design and described in the previous evaluation.

Summary of Conclusion for the Activities 50.59 Review:

The proposed activity may be implemented without prior NRC approval because the UFSAR is not adversely affected and no licensing changes are required. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased. This is because the design basis functions and capabilities of the SR and IR channels as described in the UFSAR are not affected. The new system is designed to have a lower probability for malfunction. Since the design basis functions are performed by the new SR and IR equipment, the consequences of a previously evaluated accident are not increased. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created. This is because the design basis functions and capabilities of the SR and IR channels as described in the UFSAR are not affected. The results of any hypothesized malfunction of the new equipment are the same as previously evaluated; therefore, there are no new different malfunctions. The SR and IR equipment is a passive monitoring system and thus has no mechanism to create a new accident. The margin of safety, as defined in the basis for any Technical Specification, is not reduced. This is because the existing setpoints and allowable values remain the same except that the IR channels are stated in % RTP as opposed to detector current. The proposed procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

50.59 REVIEW COVERSHEET FORM**50.59 Validation No.:** 6H-02-0001**Attachments:**

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review				
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.		Rev.	
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.		Rev.	
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	<u>6H-02-0001</u>	Rev.	<u>0</u>

50.59 REVIEW COVERSHEET FORM**50.59 Validation No.:** 6H-02-0002**Station:** Byron**Activity/Document Number:** 1BVSr 3.1.11-3, 1BVSr XPT-23, 1BVSr 1.4.3-1, 1BVSr 1.7.1-1, SPP 01-018**Revision Number:** 0**Title:** Procedure Revisions for DCP 9900266**Description of Activity:**

The proposed activity will update the referenced procedures to reflect the installation of DCP 9900266. This activity involves the deletion of procedures no longer applicable and the revision/creation of procedures to operate or test the new equipment. DCP 9900266 modifies the equipment associated with the Technical Specification required automatic boron dilution prevention system (BDPS). The BDPS system is replaced with alarms, indications, procedures, and controls. When alerted by one or more of these alarms during Modes 3, 4, or 5, the operator evaluates the plant condition and, if necessary, aligns the reactor vessel to the refueling water storage tank (RWST) to borate and prevent the reactor from going critical. This modification required prior NRC approval due to a necessary license amendment which has been obtained and already implemented on Unit 2 as Amendment 117.

Reason for Activity:

These procedures are updated out of necessity due to the plant modification. The reason for the modification was to enable the station to comply with Technical Specification Action without continued reliance on the Required Actions. The existing BDPS system is continually inoperable due to analysis failures.

Effect of activity:

The effect of updating these procedures in association with the implementation of DCP 9900266 will be that the equipment will operate in a manner consistent with its design and as described in the previous evaluation.

Summary of Conclusion for the Activities 50.59 Review:

The proposed activity may be implemented without prior NRC approval because the UFSAR is not adversely affected and these changes are necessary to comply with the NRC approved license change. The NRC staff has previously confirmed the acceptability of this license amendment based upon this modification and associated procedure changes. The proposed procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

50.59 REVIEW COVERSHEET FORM

50.59 Validation No.: 6H-02-0002

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.		Rev. <u> </u>
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.		Rev. <u> </u>
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	<u>6H-02-0002</u>	Rev. <u> 0 </u>

50.59 REVIEW COVERSHEET FORM

LS-AA-104-1001

01/11/01

Page 1 of 1

Station: Byron

Activity/Document Number: BOP RH-6

Revision Number: 22

Title: Placing the Residual Heat Removal (RH) System in Shutdown Cooling

Description of Activity:

The proposed activity will incorporate the methodology from Braidwood BwOP RH-6 into the similar Byron Operating procedure (BOP RH-6). The procedure will have two different steps for RH system startup based on existing reactor coolant system temperatures. The RH system startup is unchanged for temperatures at or below 260°F. For temperatures above 260°F up to 350°F, a new sequence of steps is provided to ensure RH system warmup rates are not exceeded. The primary difference will be the direction to deenergize the pump recirculation valve in the open position to prevent uncontrolled temperature transients.

Reason for Activity:

The revision is required to provide the necessary guidance to the main control room operators to ensure the recommendations described in Westinghouse Technical Bulletin ESBU-TB-96-03, RHR Pump Operating Recommendations, are addressed. This will ensure integrity of the RH system and eliminate potential problems caused by rapid temperature changes.

Effect of Activity:

The revision will provide the necessary guidance to the operators to prevent potential damage to the RH pumps caused by excessive heat up rates.

Summary of Conclusion for the Activities 50.59 Review:

The proposed activity may be implemented without prior NRC review and approval since operation of the RH system is not an initiator to any accident and will not alter the consequences of any analyzed accident, or create the possibility of a different type of accident, when operated in accordance with the revised procedure. All potentially affected systems, structures, or components (SSCs), and their potential failure modes, are bounded by the existing failures modes and effects analysis, hence, the consequences of any failure of an SSC remain unchanged. The potential for increased failure rates for the circuit breaker associated with the recirculation valve is extremely low based on usage and existing preventative maintenance programs. This revision does not affect the operation of the required emergency core cooling system train, therefore, there is no affect on any design basis limit for fission product barrier. Finally, this procedure change does not involve a method of evaluation, hence, there is no departure from a method of evaluation described in the UFSAR.

Attachments:

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if multiple discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>
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<input checked="" type="checkbox"/>

Applicability Review

50.59 Screening

50.59 Screening No. _____

Rev. _____

50.59 Evaluation

50.59 Evaluation No. _____

Rev. _____

50.59 Validation

50.59 Validation No. 6H-02-0008

Rev. 0

50.59 REVIEW COVERSHEET FORM

50.59 Validation No.: 6H-02-0016

Station: Byron

Activity/Document Number: 2BVSr 3.1.11-1, 2BVSr 3.1.11-2, 2BVSr 3.1.11-3, 2BVSr 9.3.2-1, 2BVSr XPT-3, 2BVSr XPT-4, 2BVSr XPT-6, 2BVSr XPT-11, 2BVSr XPT-12, 2BVSr XPT-14, 2BVSr XPT-18, 2BVSr XPT-22, 2BVSr XPT-23, 2BVSr XPT-24, SPP 02-006

Revision Number: 0

Title: Procedure Revisions for DCP 9800196

Description of Activity:

The proposed activity will update the referenced procedures to reflect the installation of DCP 9800196. This activity involves the deletion of procedures no longer applicable and the revision/creation of procedures to operate and test the new equipment. DCP 9800196 replaced the Westinghouse source range (SR) and intermediate range (IR) drawers in the main control room with SR and IR drawers provided by Gamma-Metrics (GM). The new GM drawers receive their signal input from existing GM detectors.

Reason for Activity:

These procedures are updated out of necessity due to the plant modification. The reason for the modification was to prove the system performance, most notably a decrease in electrical noise susceptibility in the SR channels.

Effect of activity:

The effect of updating these procedures in association with the implementation of DCP 9800196 will be that the equipment will operate in a manner consistent with its design and described in the previous evaluation.

Summary of Conclusion for the Activities 50.59 Review:

The proposed activity may be implemented without prior NRC approval because the UFSAR is not adversely affected and no licensing changes are required. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased. This is because the design basis functions and capabilities of the SR and IR channels as described in the UFSAR are not affected. The new system is designed to have a lower probability for malfunction. Since the design basis functions are performed by the new SR and IR equipment, the consequences of a previously evaluated accident are not increased. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created. This is because the design basis functions and capabilities of the SR and IR channels as described in the UFSAR are not affected. The results of any hypothesized malfunction of the new equipment are the same as previously evaluated; therefore, there are no new different malfunctions. The SR and IR equipment is a passive monitoring system and thus has no mechanism to create a new accident. The margin of safety, as defined in the basis for any Technical Specification, is not reduced. This is because the existing setpoints and allowable values remain the same except that the IR channels are stated in % RTP as opposed to detector current. The proposed procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

50.59 REVIEW COVERSHEET FORM**50.59 Validation No.:** 6H-02-0016**Attachments:**

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review			
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.		Rev. <u> </u>
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.		Rev. <u> </u>
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	<u>6H-02-0016</u>	Rev. <u>0</u>

50.59 REVIEW COVERSHEET FORM

50.59 Validation No.: 6H-02-0025

Station: Byron

Activity/Document Number: Emergency Procedures 2BCA-0.0, 2BCA-0.1, 2BCA-2.1, 2BCA-3.1, 2BCA-3.2, 2BCA-3.3, 2BEP-3, 2BEP ES-0.1, 2BEP ES-1.1, 2BEP ES-1.2, 2BFR-S.2, 2BST-1, 2BOA ELEC-2, 2BOA INST-1, 2BOA PRI-5, 2BOA ROD-3 and non-Emergency Procedures on Attached List

Revision Number: 0

Title: Procedure Revisions for DCP 9800196

Description of Activity:

The proposed activity will update the referenced procedures to reflect the installation of DCP 9800196. This activity involves the deletion of procedures no longer applicable and the revision/creation of procedures to operate or test the new equipment. DCP 9800196 replaced the Westinghouse source range (SR) and intermediate range (IR) drawers in the main control room with SR and IR drawers provided by Gamma-Metrics (GM). The new GM drawers receive their signal input from existing GM detectors.

Reason for Activity:

These procedures are updated out of necessity due to the plant modification. The reason for the modification was to improve the system performance, most notably a decrease in electrical noise susceptibility in the SR channels.

Effect of activity:

The effect of updating these procedures in association with the implementation of DCP 9800196 will be that the equipment will operate in a manner consistent with its design and described in the previous evaluation.

Summary of Conclusion for the Activities 50.59 Review:

The proposed activity may be implemented without prior NRC approval because the UFSAR is not adversely affected and no licensing changes are required. The probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased. This is because the design basis functions and capabilities of the SR and IR channels as described in the UFSAR are not affected. The new system is designed to have a lower probability for malfunction. Since the design basis functions are performed by the new SR and IR equipment, the consequences of a previously evaluated accident are not increased. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created. This is because the design basis functions and capabilities of the SR and IR channels as described in the UFSAR are not affected. The results of any hypothesized malfunction of the new equipment are the same as previously evaluated; therefore, there are no new different malfunctions. The SR and IR equipment is a passive monitoring system and thus has no mechanism to create a new accident. The margin of safety, as defined in the basis for any Technical Specification, is not reduced. This is because the existing setpoints and allowable values remain the same except that the IR channels are stated in % RTP as opposed to detector current. The proposed procedure changes are consistent with the design change in that the procedures direct operation or testing of the equipment in accordance with the design. Therefore, the procedure changes are bounded by the previous evaluation performed for the design change.

50.59 REVIEW COVERSHEET FORM**50.59 Validation No.:** 6H-02-0025**Attachments:**

Attach completed Applicability Review if 50.59 Screening is not required.

Attach completed 50.59 Screening if 50.59 Evaluation is not required.

Attach completed 50.59 Evaluation if required to be performed.

Attach completed 50.59 Screening and 50.59 Evaluation if discrete elements of an activity have been linked together and certain elements required a 50.59 Evaluation while other elements did not.

Forms Attached: (Check all that apply.)

<input type="checkbox"/>	Applicability Review				
<input type="checkbox"/>	50.59 Screening	50.59 Screening No.		Rev.	
<input type="checkbox"/>	50.59 Evaluation	50.59 Evaluation No.		Rev.	
<input checked="" type="checkbox"/>	50.59 Validation	50.59 Validation No.	<u>6H-02-0025</u>	Rev.	<u>0</u>

50.59 REVIEW COVERSHEET FORM50.59 Validation No.: 6H-02-0025

Non Emergency procedures

2BGP 100-1	2BOSR 3.1.7-42	BAR 2-10-C3
2BGP 100-1T1	2BOSR 3.1.7-43	BAR 2-10-D3
2BGP 100-1T2	2BOSR 3.1.7-44	BAR 2-10-D8
2BGP 100-1T3	2BOSR 3.1.8-31/35	BAR 2-10-E1
2BGP 100-1T5	2BOSR 3.1.8-32/36	BAR 2-10-E2
2BGP 100-2T2	2BOSR 3.1.8-35	BAR 2-10-E3
2BGP 100-2T3	2BOSR 3.1.8-36	BAR 2-11-B2
2BGP 100-3	2BOSR 3.2.9-1	BAR 2-11-E2
2BGP 100-3T1	2BOSR 3.2.9-2	BAR 2-13-A2
2BGP 100-3T2	2BOSR 3.3.1-1	BAR 2-4-A3
2BGP 100-4	2BOSR 3.4.1-1	BAR 2-4-B3
2BGP 100-4T1	2BOSR 6.1.1-7	BAR 2-4-D6
2BGP 100-5	2BOSR 6.1.1-8	BAR 2-BP-1.2
2BGP 100-5T1	2BOSR 6.1.1-9	BAR 2-BP-1.3
2BGP 100-6	2BOSR 6.2.1-1	BAR 2-BP-2.2
2BGP 100-6T1	2BOSR 6.2.1-2	BAR 2-BP-2.3
2BGP 100-6T2	2BOSR 6.2.1-3	BAR 2-BP-3.2
2BGP 100-6T3	2BOSR 6.3.6-1	BAR 2-BP-3.4
2BGP 100-6T4	2BOSR 6.3.7-1	BAR-A-MODEL-ALARM-E
2BGP 100-7T2	2BOSR 6.3.7-2	BAR-A-MODEL-ALARM-E
2BGP 100-7T3	2BOSR 8.1.14-2	BFP FH-13T3
2BGP 100-7T4	2BOSR 8.1.17-2	BFP FH-14
2BGP 100-A13	2BOSR 8.1.2-2	BFP FH-14T2
2BOL 9.3	2BOSR DG-3	BFP FH-16
2BOSR 0.1-1,2,3	2BOSR XFP-Q1	BOP AP-100
2BOSR 0.1-4	2BOSR XFP-R1	BOP AP-101
2BOSR 0.1-5	BAP 300-1	BOP AP-71
2BOSR 0.1-6	BAP 370-3	BOP AP-71T1
2BOSR 3.1.13-1	BAR 2-10-A1	BOP AP-71T2
2BOSR 3.1.2-1	BAR 2-10-A2	BOP AP-72
2BOSR 3.1.5-1	BAR 2-10-B1	BOP AP-72T1
2BOSR 3.1.5-2	BAR 2-10-B2	BOP AP-72T2
2BOSR 3.1.7-31	BAR 2-10-C1	BOP FR-1
2BOSR 3.1.7-32	BAR 2-10-C2	BOP IP-2
2BOSR 3.1.7-41		BOP RP-6