

RS-03-195

October 14, 2003

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

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

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

Subject: Corrected Information Supporting a Technical Specification Change  
Request – Extension of Completion Time for Instrument Bus Inverters

- Reference:
- (1) Letter from Keith R. Jury (Exelon Generation Company, LLC) to U.S. NRC, "Request for Technical Specification Change – Extension of Completion Time for Instrument Bus Inverters," dated October 16, 2002
  - (2) Letter from Kenneth A. Ainger (Exelon Generation Company, LLC) to U.S. NRC, "Response to a Request for Additional Information Regarding a Technical Specification Change Request – Extension of Completion Time for Instrument Bus Inverters," dated June 20, 2003

In Reference 1, Exelon Generation Company, LLC (EGC) requested NRC approval of a proposed change to Technical Specifications (TS) of Facility Operating License Nos. NPF-72, NPF-77, NPF-37 and NPF-66, for the Braidwood Station, Units 1 and 2, and the Byron Station, Units 1 and 2, respectively. The proposed change would revise the Completion Time for Required Action A.1 of TS 3.8.7, "Inverters – Operating," from the current 24 hours, for one instrument bus inverter inoperable, to 14 days.

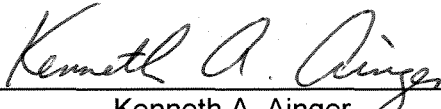
During the NRC's review of the requested change, a number of questions were raised and the NRC subsequently requested that we provide additional information to support justification of the proposed TS change. Our response to the NRC's request was provided in Reference 2. In Attachment 1 of Reference 2, we presented data regarding the inverter core damage frequency (CDF) results and inverter large early release frequency (LERF) results. Specifically, Table 3, "Inverter CDF Results," and Table 4, "Inverter LERF

Results," found in Reference 2, Attachment 1, pages 8 and 9 respectively, present this data in tabular format. During routine ongoing probabilistic risk assessment (PRA) model reviews, minor discrepancies were identified that affect the CDF and LERF data related to the inverters. This issue was entered into the EGC corrective action program. The impact of these discrepancies on the CDF and LERF values given in Tables 3 and 4 is not significant and does not affect the conclusions of the original Technical Specification change request presented in Reference 1. The corrected data is being submitted to the NRC to ensure accuracy of the supporting data for the proposed change. The corrected data is provided in Attachment 1 to this letter.

Should you have any questions related to this matter, please contact J. A. Bauer at (630) 657-2801.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2003

  
Kenneth A. Ainger  
Manager, Licensing

Attachment 1: Corrected Information Supporting a Technical Specification Change Request – Extension of Completion Time for Instrument Bus Inverters

## Attachment 1

### Corrected Information Supporting a Technical Specification Change Request – Extension of Completion Time for Instrument Bus Inverters

The below information was originally submitted to the NRC in a letter from Kenneth A. Ainger (Exelon Generation Company, LLC) to U.S. NRC, "Response to a Request for Additional Information Regarding a Technical Specification Change Request – Extension of Completion Time for Instrument Bus Inverters," dated June 20, 2003.

Both the original data and corrected data (in bold) are given below. The original Table 3 is found on Attachment 1, page 8, in the above noted June 20, 2003 letter.

**TABLE 3**  
**Inverter CDF Results**

UNIT	INV OOS	CDF* PER YEAR	DELTA CDF PER YEAR	ICCDP <5E-7	DELTA AVE CYCLE CDF < 1E-6/YR
BRAIDWD U1	NONE	3.26E-05	NA	NA	3.56E-09
	111	3.26E-05	1.39E-10	5.33E-12	
	112	3.26E-05	0.00E+00	0.00E+00	
	113	3.26E-05	0.00E+00	0.00E+00	
	114	3.27E-05	1.39E-07	5.34E-09	
BRAIDWD U2	NONE	3.24E-05	NA	NA	3.57E-09
	211	3.24E-05	1.39E-10	5.33E-12	
	212	3.24E-05	0.00E+00	0.00E+00	
	213	3.24E-05	0.00E+00	0.00E+00	
	214	3.25E-05	1.40E-07	5.35E-09	
BYRON U1	NONE	5.36E-05	NA	NA	2.56E-09
	111	5.36E-05	1.19E-10	4.56E-12	<b>2.8E-09</b>
	112	5.36E-05	0.00E+00	0.00E+00	
	113	5.36E-05	0.00E+00	0.00E+00	
	114	5.37E-05	1.09E-07	4.19E-09	
BYRON U2	NONE	5.26E-05	NA	NA	2.56E-09
	211	<b>5.27E-05</b>	1.19E-10	4.55E-12	<b>2.57E-09</b>
	212	5.26E-05	0.00E+00	0.00E+00	
	213	5.26E-05	0.00E+00	0.00E+00	
	214	5.27E-05	1.00E-07	3.84E-09	
		<b>5.28E-05</b>		<b>3.85E-09</b>	

\* CDF truncation at 1E-10

## Attachment 1

### Corrected Information Supporting a Technical Specification Change Request – Extension of Completion Time for Instrument Bus Inverters

Both the original data and corrected data (in bold) are given below. The original Table 4 is found on Attachment 1, page 9, in the above noted June 20, 2003 letter.

**TABLE 4**  
**Inverter LERF Results**

UNIT	INV OOS	LERF* Per year	DELTA LERF Per year	ICLERP <5E-8	DELTA AVE CYCLE LERF < 1E-7/YR
BRAIDWD U1	NONE	4.06E-06	NA	NA	3.26E-10
	111	4.07E-06	4.08E-09	1.56E-10	
	112	4.06E-06	0.00E+00	0.00E+00	
	113	4.06E-06	0.00E+00	0.00E+00	
	114	4.07E-06	8.66E-09	3.32E-10	
			8.65E-09		
BRAIDWD U2	NONE	4.31E-06	NA	NA	4.17E-10
	211	4.31E-06	4.08E-09	1.56E-10	
	212	4.31E-06	0.00E+00	0.00E+00	
	213	4.31E-06	0.00E+00	0.00E+00	
	214	4.32E-06	1.22E-08	4.69E-10	
BYRON U1	NONE	4.85E-06 4.84E-06	NA	NA	2.08E-10
	111	4.85E-06 4.84E-06	2.24E-09	8.60E-11	
	112	4.85E-06 4.84E-06	0.00E+00	0.00E+00	
	113	4.85E-06 4.84E-06	0.00E+00	0.00E+00	
	114	4.85E-06	5.91E-09	2.26E-10	
				2.27E-10	
BYRON U2	NONE	5.49E-06 5.48E-06	NA	NA	2.63E-10
	211	5.49E-06 5.48E-06	2.22E-09	8.52E-11	
	212	5.49E-06 5.48E-06	0.00E+00	0.00E+00	
	213	5.49E-06 5.48E-06	0.00E+00	0.00E+00	
	214	5.50E-06	8.08E-09	3.10E-10	
		5.49E-06	8.04E-09	3.09E-10	