

RS-03-215

November 7, 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: Revision to Technical Specification Change Request – Extension of
Completion Time for Instrument Bus Inverters

Reference: 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

In the referenced letter, 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, concerns were raised regarding the duration of the requested Completion Time. Although the requested change was in accordance with the NRC's guidance regarding risk-informed licensing actions, following a number of discussions with the NRC, EGC determined that increasing the Completion Time for Required Action A.1 of TS 3.8.7 to seven days would address the immediate needs of Byron and Braidwood Stations. Therefore, we are revising our initial request to increase the Completion Time for Required Action A.1 of TS 3.8.7 from the current 24 hours to 14 days; and are now requesting NRC approval of a seven-day Completion Time for Required Action A.1 of TS 3.8.7, based on the justification previously presented in the referenced letter.

Based on the aforementioned discussions between the NRC and EGC, we understand that the NRC will continue to review the potential of extending the Completion Time for instrument inverters up to 14 days on a generic industry-wide basis. Upon conclusion of the NRC's review, we may pursue a further increase in the Completion Time for instrument inverters, as appropriate.

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

11/7/03



Keith R. Jufy

Director, Licensing and Regulatory Affairs