



Byron Generating Station

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U.S. Nuclear Regulatory Commission
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Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Subject: 2017 Regulatory Commitment Change Summary Report

The purpose of this report is to provide the Exelon Generation Company, LLC (EGC) "Regulatory Commitment Change Summary Report" for Byron Station for commitment changes processed during the period from January 1, 2017 through December 31, 2017. Commitment changes are processed in accordance with Nuclear Energy Institute's (NEI) 99-04, Revision 0, "Guidance for Managing NRC Commitment Changes," dated July 1999 and associated implementing procedures. For the period from January 1, 2017 through December 31, 2017, there was one commitment change processed in accordance with NEI 99-04, Revision 0 and associated implementing procedures requiring NRC notification.

If you have any questions concerning this report, please contact Douglas Spitzer, Regulatory Assurance Manager at (815) 406-2800.

Respectfully,

A handwritten signature in black ink, appearing to read "Mark E. Kanavos".

Mark E. Kanavos
Site Vice President
Byron Generating Station

MEK/LZ/rm

Attachments

ATTACHMENT A

BYRON STATION

REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2017

Commitment Number: 454-251-81-0239/0240/ATI 9951/9952

Original Document and Commitment:

This change refers to commitments made in response to both NRC Generic Letters (GL) 83-28 and 90-03.

In response to NRC GL 90-03, the recommendation for vendor interface, licensees and applicants shall establish, implement, and maintain a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of their plants, and is appropriately referenced or incorporated in plant instructions and procedures. Vendors of safety-related equipment should be contacted and an interface shall be established. Where vendors cannot be identified, have gone out of business, or will not supply information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement, and report, to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function (GDC-1). The program shall be closely coupled with action 2.2.1 (Equipment classification). An adequate vendor interface program should include:

- a) A program with the NSSS vendor as described in the VETIP, which covers all the safety-related components within the NSSS scope of supply. This program should include provisions for assuring receipt by licensee/applicant of all technical information provided by the NSS vendor:

and

- b) A program of periodic contact with the vendors of other key safety-related components not included in (a) above.

The vendor interface program should also take into account the requirements of 10 CFR Part 50, Appendix B which requires the licensee or applicant to be responsible for establishing and executing the quality assurance program.

Item (a) above is not affected by this commitment change. Item (b) above is implemented by procedures CC-AA-204 - Control of Vendor Equipment Manuals and CC-AA-204-1001 - Control of Vendor Equipment Manuals Guidelines. Section 4.7 of CC-AA-204-1001 describes the selection process for "key safety related components," and the requirements for periodic recontact. The motivation to delete this commitment is due to cost and resources.

The commitments made in response to NRC GL 90-03 superseded the commitments made in response to NRC GL 83-28.

In response to NRC GL 83-28 the Commission had reviewed intermediate-term actions to be taken by licensees and applicants as a result of the Salem anticipated transient without scram (ATWS) events. These actions were developed by the staff based on information contained in NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant." These actions address issues related to reactor trip system reliability and general management capability.

For vendor interface, the NRC recommended that licensees and applicants “establish, implement and maintain a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of their plants, and is appropriately referenced or incorporated in plant instructions and procedures. Vendors of safety-related equipment should be contacted and an interface established. Where vendors cannot be identified, have gone out of business, or will not supply information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement, and report, to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function (GDC-1). The program shall be closely coupled with action 2.2.1 (Equipment classification).

The program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. It shall also define the interface and division of responsibilities among the licensee and the nuclear and nonnuclear divisions of their vendors that provide service on safety-related equipment to assure that requisite control of an applicable instructions for maintenance work on safety-related equipment are proved.

“A formal vendor interface program must be established for every safety component.”

NRC GL 90-03 relaxed the “every safety-related component” to “all the safety-related components within the NSSS scope of supply “and key safety-related components.”

The intent of the commitment was to ensure the reliability of the safety related components by ensuring that the plant had implemented the correct preventative and corrective maintenance instructions. The OPEX from the Salem ATWS was that the plant had not corrected the preventative maintenance instructions for the reactor trip switchgear after the vendor had updated its own instructions regarding periodic lubrication.

Subject of Change:

Exelon Corp will discontinue the program of periodic contact with the vendors of other (non-NSSS) key safety-related components (item b above).

The program with the NSSS vendor which covers all the safety-related components within the NSSS scope of supply will not be affected (item a above).

Justifications for Change:

The periodic recontact of vendors is redundant. The reliability of safety related components at Byron is assured by preventative maintenance and performance monitoring actions implemented after the commitments made in response to these two NRC Generic Letters. The preventative maintenance tasks, frequencies, and detailed actions are subject to continuous improvement and monitoring for effectiveness.

Status:

The commitment was changed under Commitment Change Number 17-009.