

ATTACHMENT D

MARKED UP PAGES FOR

PROPOSED CHANGES TO APPENDIX A

TECHNICAL SPECIFICATIONS OF

FACILITY OPERATING LICENSES NPF-37, NPF-66, NPF-72 AND NPF-77

BYRON STATION

Revised Pages: 3/4 5-4

BRAIDWOOD STATION

3/4 5-4

9003220190 900312
PDR ADUCK 05000454
F PDC

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS

3.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the following valves are in the indicated positions with power to the valve operators removed:

<u>Valve Number</u>	<u>Valve Function</u>	<u>Valve Position</u>
MOV SI8806	Suction to the SI Pumps	Open
MOV SI8835	SI Pump Discharge To RCS Cold Legs	Open*
MOV SI8813	SI Pump Recirculation To The RWST	Open
MOV SI8809A	RHR Pump Discharge to RCS Cold Legs	Open*
MOV SI8809B	RHR Pump Discharge to RCS Cold Legs	Open*
MOV SI8840	RHR Pump Discharge to RCS Hot Legs	Closed
MOV SI8802A	SI Pump Discharge to RCS Hot Legs	Closed
MOV SI8802B	SI Pump Discharge to RCS Hot Legs	Closed

- b. At least once per 31 days by:

- 1) ~~Verifying that the ECCS piping is full of water by venting the ECCS pump casings and accessible discharge piping high points, and~~ ^{U.C.}
 - 2) Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suctions during LOCA conditions. This visual inspection shall be performed:

Outside of
containment,

*Valves may be realigned for testing pursuant to Specification 4.4.6.2.2.

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the following valves are in the indicated positions with power to the valve operators removed:

<u>Valve Number</u>	<u>Valve Function</u>	<u>Valve Position</u>
MOV SI8806	Suction to the SI Pumps	Open
MOV SI8835	SI Pump Discharge To RCS Cold Legs	Open*
MOV SI8813	SI Pump Recirculation To The RWST	Open
MOV SI8809A	RHR Pump Discharge to RCS Cold Legs	Open*
MOV SI8809B	RHR Pump Discharge to RCS Cold Legs	Open*
MOV SI8840	RHR Pump Discharge to RCS Hot Legs	Closed
MOV SI8802A	SI Pump Discharge to RCS Hot Legs	Closed
MOV SI8802B	SI Pump Discharge to RCS Hot Legs	Closed

- b. At least once per 31 days by:

- 1) ~~Verifying that the ECCS piping is full of water by venting the ECCS pump casings and accessible discharge piping high points, and~~ ^{U.C.}
- 2) Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

- c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suctions during LOCA conditions. This visual inspection shall be performed:

outside of
containment,

Valves may be realigned for testing pursuant to Specification 4.4.6.2.2.

ENCLOSURE TO

APPLICATION FOR AMENDMENT TO

FACILITY OPERATING LICENSES NPF-37, NPF-66, NPF-72 AND NPF-77

Reference (a), March 17, 1989 S.C. Hunsader letter
to T.E. Murley

Reference (b), August 25, 1989 S.C. Hunsader letter
to T.E. Murley



Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

August 25, 1989

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Application for Amendment to
Facility Operating Licenses NPF-37, NPF-66
NPF-72 and NPF-77
Appendix A, Technical Specifications
NRC Docket Nos. 50-454, 50-455,
50-456 and 50-457

Reference: (a) March 17, 1989 S.C. Hunsader letter
to T.E. Murley

Dear Dr. Murley:

In reference (a) pursuant to 10 CFR 50.90, Commonwealth Edison (Edison) proposed to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF-37, NPF-66, NPF-72 and NPF-77. The proposed amendment requested a change to Technical Specification 4.5.2 to modify the existing surveillance requirements for venting of ECCS discharge piping. This change is expected to reduce exposure to radiation in accordance with ALARA guidelines without reducing the safe operation of the ECCS equipment.

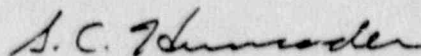
The purpose of this letter is to supplement reference (a) with additional information that presents the amount of radiation exposure expected to be saved. Attachment A provides a representative example for Byron Unit 1 and Braidwood Unit 1, with respect to radiation exposure. This review was performed for Unit 1 at each station because seven (7) high point vent valves are installed inside containment in Unit 1, in the Safety Injection (SI) lines, that are not installed inside Unit 2. During the upcoming scheduled meeting at Braidwood Station on September 25 and 26, 1989, Edison will discuss the details of our review in this area that demonstrates the acceptability of this difference in support of the Technical Specification Amendment request.

~~8909060226~~ 3pp

August 25, 1989

Please direct any questions you may have concerning this submittal to this office.

Very truly yours,



S.C. Hunsader
Nuclear Licensing Administrator

/scl:0028T:20-21

Att.'s (A): ECCS Piping Vent Valve Radiation Exposure Savings

cc: Resident Inspector-Braidwood
Resident Inspector-Byron
L.N. Olshan-NRR
S.P. Sands-NRR
Regional Office III
M.C. Parker-State of Ill.

ATTACHMENT A

BYRON/BRAIDWOOD

ECCS PIPING VENT VALVES

UNIT 1 RADIATION EXPOSURE SAVINGS

ASSUMPTIONS: UNIT AT FULL POWER
GENERAL AREA DOSE RATES (utilizing low dose hold areas)
0.25 HOUR STAY TIME PER LOCATION
3 PERSONNEL PER LOCATION
PERFORMED MONTHLY (ie 12 INSPECTIONS PER YEAR)

4 LOCATIONS AT 377' RO6, RO7

7 TO 10 MR/HR X 4 LOCATIONS X 3 PERSONS X 0.25 HOUR
=21-30 MR/PERFORMANCE
=21-30 MR/PERFORMANCE X 12 PERFORMANCE
=0.25-0.36 MAN-REM/YEAR
=0.32 AVERAGE MAN-REM/YEAR

2 LOCATIONS AT 412' RO6

10 TO 20 MR/HR X 2 LOCATIONS X 3 PERSONS X 0.25 HOUR
=15-30 MR/PERFORMANCE
=15-30 MR/PERFORMANCE X 12 PERFORMANCE
=0.18-0.36 MAN-REM/YEAR
=0.27 AVERAGE MAN-REM/YEAR

2 LOCATIONS AT 412' RO2

50 TO 150 MR/HR X 2 LOCATIONS X 3 PERSONS X 0.25 HOUR
=75-225 MR/PERFORMANCE
=75-225 MR/PERFORMANCE X 12 PERFORMANCE
=0.9-2.7 MAN-REM/YEAR
=1.8 AVERAGE MAN-REM/YEAR

TOTAL AVERAGE YEARLY MAN-REM SAVINGS:

$$0.32 + 0.27 + 1.8 = \underline{2.39 \text{ MAN-REM}}$$