Exelon Generation®

Byron Generating Station

4450 North German Church Rd
Byron, IL 61010-9794

www.exeloncorp.com

February 7, 2020

LTR: BYRON 2020-0008
File: 1.10.0101 (1D.101, 5A.106)

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

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: 2019 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, 2019 through December 31, 2019. 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, 2019 through December 31, 2019, there were four commitment changes 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 Jamie Getchius, Principal Regulatory Engineer at (815) 406-2991.

Respectfully,

Harris L. Welt
Plant Manager
Byron Generating Station

HLW/WJG/rm

Attachments

ATTACHMENT A

BYRON STATION

REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2019

Commitment Number: 454-104-89-013

Original Document and Commitment:

The source of the commitment is Commonwealth Edison letter of May 31, 1988 from W.E. Morgan to A. Bert Davis, with a subject of Zion Station Units 1 and 2, Byron Station Units 1 and 2, Braidwood Station Units 1 and 2 Response to NRC Generic Letter 88-05 NRC Docket Nos. 50-295/304, 50-454/455 and 50-456/457. In this letter, Commonwealth Edison committed that, for the location of small coolant leaks, Byron and Braidwood utilize VT-2 Procedures and qualified VT-2 examiners.

Subject of Change:

This commitment was deleted.

Justifications for Change:

The Boric Acid Control Program was added to the B/B UFSAR in Appendix F, Section A.2.1.4, Boric Acid Corrosion. This addition was approved by the NRC via NUREG 2190 Safety Evaluation Report Related to the License Renewal of Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2. B/B UFSAR Section A.2.1.4, Boric Acid Corrosion, states, "This program is implemented in response to NRC GL 88-05 and operating experience." So, commitments associated with NRC GL 88-05 are contained in the B/B UFSAR, which has its own change processes outside of the commitment change process.

Status:

The commitment was changed under Commitment Change Number 19-001.

ATTACHMENT B

BYRON STATION

REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2019

Commitment Number: 454-104-89-013

Original Document and Commitment:

This change refers to commitments made in response to NRC Generic Letter 89-13.

In Byron Letter 90-0016 of January 3, 1990 to US Nuclear Regulatory Commission, Byron Station Committed to performing inspections on Reactor Containment Fan Coolers (RCFCs) for fouling and degradation on a frequency that was no longer than five years.

Byron Commitment Change 03-14, reported in Byron Letter 2004-0035 of April 1, 2004 to the US Nuclear Regulatory Commission, modified the inspection frequency to allow for a 25% grace period.

Subject of Change:

The NRC Generic Letter 89-13 inspection frequency for Byron U-1 and Byron U-2 RCFCs will occur on a frequency of six refueling outages plus 25% grace.

Justifications for Change:

The extension of the frequency of NRC Generic Letter 89-13 inspections for Byron Unit 1 and Byron Unit 2 RCFCs to six refueling outages plus 25% grace is justified based upon the resistance of stainless steel to general and galvanic corrosion and a review of past inspection results for bypass flow impacts, microfouling effects, and scaling.

A review of maintenance history for the impact of corrosion on the RCFCs supports the extension of NRC Generic Letter 89-13 inspection frequency. A review of the inspection results shows that the corrosion found would not have had an adverse impact on RCFC performance had the inspection been performed on a frequency of six refueling outages plus 25% grace. Furthermore, station efforts are in effect to replace all carbon steel RCFC channel heads with stainless steel counterparts. This will further decrease the effects of corrosion as stainless steel is less susceptible to general and galvanic corrosion. For RCFCs without stainless steel channel heads, inspection frequency will be controlled by commitments associated with Byron License Renewal.

Status:

The commitment was changed under Commitment Change Number 19-002.

ATTACHMENT C

BYRON STATION

REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2019

Commitment Number: 454-101-88-008

Original Document and Commitment:

This change refers to commitments made in response to NRC generic letter 88-08.

Commonwealth Edison Ltr to U.S. Nuclear Regulatory Commission of July 17, 1989 response to NRC Bulletin 88-08 committed to planning and implementing a program to provide continuing assurance that unisolable sections of all piping connected to the Reactor Coolant System (RCS) will not be subject to combined cyclic and static thermal and other stresses that could cause fatigue failure during the remaining life of the unit. To satisfy this commitment, Byron Station implemented a procedure, BVP 900-9, which has been performed to record temperatures of Residual Heat Removal (RHR) and Auxiliary Spray piping at the beginning of power operation, after startup from a refueling outage, and every six months thereafter.

Subject of Change:

This commitment will be satisfied by performance of Exelon Generation Procedure ER-AP-4701, "Guidance for MRP-146 and MRP-192 Implementation" and will be tracked by commitments associated with the Byron License Renewal Aging Management Program. Byron Station procedure, BVP 900-9, which has been performed to record temperatures of Residual Heat Removal and Auxiliary Spray piping at the beginning of power operation, after startup from a refueling outage, and every six months thereafter will be deleted.

Justifications for Change:

Assessment of unisolable sections of piping connected to the RCS will continue to be performed per ER-AP-4701. Byron Station has completed an Engineering Change Evaluation to evaluate all RCS branch lines per EPRI Maintenance Reliability Program (MRP)-146, "Management of Thermal Fatigue in Normally Stagnant Non-Isolable Reactor Coolant System Branch Lines," and EPRI MRP-170, "EPRI Thermal Fatigue Evaluation per MRP-146." The Auxiliary Spray Piping and RHR Piping monitored by BVP 900-9 were not identified as being susceptible to combined cyclic and static thermal and other stresses that could cause fatigue failure.

Status:

The commitment was changed under Commitment Change Number 19-004.

ATTACHMENT D

BYRON STATION

REGULATORY COMMITMENT CHANGE SUMMARY REPORT FOR 2019

Commitment Number: 8400-01

Original Document and Commitment:

This change refers to commitments made in response to NRC Generic Letter (GL) 93-04.

The Byron Station supplemental response to Generic Letter (GL) 93-04 is provided in an Attachment to the letter from D.J. Chrzanowski (Commonwealth Edison) to U.S. NRC, "Supplemental Response to GL 93-04, "Rod Control System Failure and Withdrawal of Rod Control Cluster Assemblies," dated September 16, 1993. The attachment reads as follows:

"While the assessment indicates that the licensing basis is currently satisfied, Commonwealth Edison and the Westinghouse Owners Group believe that there are measures that can be taken by utilities to make compliance with GDC 25 more clear. Those recommended modifications include a combination of Rod Control System logic cabinet changes (current order timing adjustments) and a plant surveillance."

In the letter written by M.J. Vonk (Commonwealth Edison) to U.S. NRC, "ComEd Response to RAI regarding Generic Letter 93-04, "Rod Control System Failure and Withdrawal of Rod Cluster Assemblies,"" dated January 11, 1995, Byron Station committed to implementation of a current order timing modification prior to startup from its next refueling outage which began after March 14, 1995 and performance of current order timing surveillance tests each refueling outage.

This commitment was changed under Commitment Change Number 18-12 to no longer be applicable to Unit 1 due to installation of the Westinghouse Ovation Rod Control Logic Cabinet Digital Upgrade.

Subject of Change:

This Commitment is now deleted due to no longer being applicable to Byron Unit 2 due to installation of the Westinghouse Ovation Rod Control Logic Cabinet Digital Upgrade. As discussed above, the Commitment was previously changed to no longer be applicable to Byron Unit 1.

Justifications for Change:

As part of the Byron Unit 1 and 2 Westinghouse Ovation Rod Control Logic Cabinet Digital Upgrade, Westinghouse has updated and provided WNA-AR-00513-CCE. Section 6.2.2 within the document evaluates the applicability of WCAP-13864 to the Rod Control Logic Cabinet digital upgrade. Section 6.2.2 states the following:

"The failures identified in WCAP-13864, "Rod Control System Evaluation Program" that resulted in single rod withdrawal (when insertion was demanded) were caused by failures in the Supervisory Logic 1 Card in the Solid State RCS Logic Cabinet. These two signals provide

direction pulses to the Slave Cycler Decoder cards to identify the direction for rod motion. The failure of these signals caused both IN and OUT directions to be enabled in the Slave Cycler Decoders. This, in turn caused both the IN and OUT timed current orders to be output together, and the low output state takes precedence over the high output state. This caused demands for full current to take precedence over demands for no/reduced current, resulting in corrupted current orders. The DRCS Digital Rod Control System] logic cabinet upgrade implements these functions (selection of IN or OUT) in software in a redundant controller. Within the Logic Cabinet upgrade, the current profiles for IN and OUT motion are stored in tables in the software. There is no failure mode that can cause both tables of data to be selected and output simultaneously."

The failure modes outlined in WCAP-13864 are not applicable to the Logic Cabinet Upgrade. The additional surveillance testing recommended by NSD-TB-94-05-ADA-R0 is no longer required. The Commitment was previously changed to no longer be applicable to Byron Unit 1 and now no longer applies to Unit 2. Based upon this, Commitment 8400-01 was deleted.

Status:

The commitment was deleted under Commitment Change Number 19-005.