

ATTACHMENT B

Summary of Revised Pages - Byron

Proposed Changes to Appendix A
Technical Specifications for Facility
Operation Licenses NPF-37 and NPF-66

Revised Page

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Summary of Revised Pages - Braidwood

Proposed Changes to Appendix A
Technical Specifications for Facility
Operation Licenses NPF-72 and NPF-77

Revised Page

3/4 7-14

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6 Two independent Control Room Ventilation Systems shall be OPERABLE.

APPLICABILITY: All MODES.

ACTION:

MODES 1, 2, 3 and 4:

INSERT 1

for reasons other than an inoperable chiller unit

- b. With one Control Room Ventilation System inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6:

- a. With one Control Room Ventilation System inoperable, ^{either 1)} restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE Control Room Ventilation System in the makeup mode ~~or 2) suspend CORE ALTERATIONS, positive reactivity additions and movement of irradiated fuel.~~
- b. With both Control Room Ventilation Systems inoperable, or with the OPERABLE Control Room Ventilation System, required to be in the makeup mode by ACTION a. not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS, ~~or positive reactivity changes.~~ *additions, or movement of irradiated fuel.*

SURVEILLANCE REQUIREMENTS

4.7.6 Each Control Room Ventilation System shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the control room air temperature is less than or equal to 90°F;
- b. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the Emergency Makeup System HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating; and flow through the recirculation charcoal adsorber for 15 minutes.
- c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the Emergency Makeup System filter plenum by:
- 1) Verifying that the cleanup system satisfies the in-place penetration testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 6000 cfm \pm 10% for the Emergency Makeup System;

INSERT 1

- a. With one Control Room Ventilation System inoperable due to an inoperable chiller unit, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6^X Two Independent Control Room Ventilation Systems shall be OPERABLE.

APPLICABILITY: ALL MODES.

ACTION:

MODES 1, 2, 3 and 4:

INSERT A

- b. With one Control Room Ventilation System inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

for reasons other than an inoperable chiller unit

MODES 5 and 6:

- a. With one Control Room Ventilation System inoperable, restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE Control Room Ventilation System in the makeup mode^{or 2) suspend CORE ALTERATIONS, positive reactivity additions and movement of irradiated fuel.}
- b. With both Control Room Ventilation Systems inoperable, or with the OPERABLE Control Room Ventilation System, required to be in the makeup mode by ACTION a. not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS, ~~or positive reactivity changes~~, additions, or movement of irradiated fuel.

either 1)

SURVEILLANCE REQUIREMENTS

4.7.6 Each Control Room Ventilation System shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the control room air temperature is less than or equal to 90°F;
- b. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the Emergency Makeup System HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating; and flow through the recirculation charcoal adsorber for 15 minutes.
- c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the Emergency Makeup System filter plenum by:
- 1) Verifying that the cleanup system satisfies the in-place penetration testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 6000 cfm \pm 10% for the Emergency Makeup System;

~~*Not applicable prior to initial criticality on Cycle 1.~~

INSERT A

- a. With one Control Room Ventilation System inoperable due to an inoperable chiller unit, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

ATTACHMENT C

Summary of the No Significant Hazards Considerations

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant considerations. According to 10CFR50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility is in accordance with the proposed amendment and would not:

1. Involve a significant increase in the probability or consequence of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

The basis for this determination of no significant hazards consideration is presented below:

1. The proposed amendment does not involve a significant increase in the probability in consequence of an accident.

The first proposed change will increase the allowed outage time (AOT) for a VC chiller from seven days to thirty days in Modes 1 through 4. The thirty day AOT is based on the low probability of an event requiring control room isolation concurrent with failure of the redundant train of VC. Therefore, one train of VC will always be available to remove normal and accident heat loads and provide control room isolation. Consequently, this change will not result in an increase to offsite dose rates or the exposure of control room operators.

Increasing the AOT will allow for more extensive maintenance and should increase overall availability of the VC chillers. This provides additional assurance that a chiller will be operable on at least one train of VC. In the unlikely event that both VC chillers became inoperable, alternate non-safety related means to maintain control room temperature are available.

Based on the above, the proposed increase to the AOT will not increase the probability or consequences of any previously analyzed accident.

The proposed change to the Action for Modes 5 and 6 adds an alternative to placing the remaining operable VC train in makeup mode. The alternative would allow the option to suspend CORE ALTERATIONS, positive reactivity changes, and movement of irradiated fuel. In Modes 5 and 6, this greatly reduces the

probability of an event that would require control room isolation. The change will have no impact on the consequences of an accident since the remaining train of VC would be capable of isolating the control room on a high radiation signal and providing the necessary temperature control. Based on this review, the proposed Action will not result in an increase in the probability or consequences of a previously analyzed accident.

The remaining change adds a restriction to suspend movement of irradiated fuel. This change reduces the probability of the occurrence of a fuel handling accident and has no impact of the consequences of any accident. In addition, for consistency with the wording in Action a, the word "changes" was replaced by the word "additions." This change is purely editorial and, therefore, has no impact on the probability or consequences of an accident.

2. The proposed admendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The first proposed change will increase the AOT for a VC chiller from seven days to thirty days in Modes 1 through 4. During the time one chiller is inoperable, the redundant train is capable of handling the heat loads during normal operation and during all accident scenarios. No new operating conditions are created by this change. Therefore, this change will not result in any new or different accident from those previously analyzed.

The proposed change to the Action for Modes 5 and 6 adds an alternative to allow the option to suspend CORE ALTERATIONS, positive reactivity changes, and movement of irradiated fuel. In Modes 5 and 6, this greatly reduces the probability of an event that would require control room isolation. Also, the remaining train of VC would still be capable of temperature control and isolating the control room on a high radiation signal. This change will not create any new plant operating conditions. Based on this review, the proposed Action will not result in a new or different kind of accident.

The additional restriction on the movement of irradiated fuel in Modes 5 and 6 will not create any new condition which has not been previously analyzed. In addition, for consistency with the wording in Action a, the word "changes" was replaced by the word "additions." This change is purely editorial and, therefore, has no potential to create a new kind of accident.

3. The proposed amendment does not involve a significant reduction in a margin of safety.

The basis for the VC Technical Specification is to ensure that the temperature in the control room does not exceed maximum allowable for the equipment and instrumentation inside. The VC system is also required to limit radiation exposure to control room personnel

following an accident. Either of the two redundant trains can perform both of these functions. As long as one train of VC is available, the margin of safety assumed in the bases for this specification is maintained.

Increasing the AOT for one VC chiller unit has no impact on the redundant train of VC. Although one train of VC may be inoperable for a longer period of time, the redundant train can perform all normal and accident functions. The length of the AOT is sufficiently short to assure that a scenario involving an accident requiring control room isolation concurrent with the failure of the redundant train is not credible. Therefore, one train of VC will remain available and no reduction is made to the margin of safety.

The second change involves adding an alternative Action in Modes 5 and 6 that would restrict CORE ALTERATIONS, positive reactivity additions, and movement of irradiated fuel. The existing Action requires that the operable train of VC be placed in the makeup mode of operation. This Action ensures that any failures are readily detected. The alternate Action reduces the potential of an event that would require control room isolation while maintaining one train of VC operable. In both cases, the Actions assure that one train of VC is available for normal and emergency use. Therefore, the proposed change maintains the margin of safety.

The last change involves the condition with no VC trains operable in Modes 5 and 6. Since VC is not available, alternative means must be used to maintain control room temperature. Since the primary alternative involves utilization of outside air, the most appropriate action is to reduce the probability of an event that would require control room isolation. The proposed additional restriction provides added assurance that such an event will not occur. Therefore, the margin of safety is maintained. Also, for consistency with the wording in Action a, the word "changes" was replaced by the word "additions." This change is purely editorial and, therefore, has no impact on the margin of safety.

ATTACHMENT D

Environmental Assessment Statement

Commonwealth Edison has evaluated the proposed amendment against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21. It has been determined that the proposed change meets the criteria for a categorical exclusion as provided for under 10CFR51.22(c) (9).

The proposed change involves the allowed outage time for one control room chiller unit. No change is made to control room isolation requirements or exposure rates for operators following an accident. Other changes involve the use of actions that would reduce the probability of a radioactive release.

The proposed change does not involve a significant hazards consideration as discussed in Attachment C to this letter. Also, this proposed amendment will not involve significant changes in the types or amounts of any radioactive effluents nor does it affect any of the permitted release paths. In addition, this change does not involve a significant increase in individual or cumulative occupational exposure. Therefore, this change meets the categorical exclusion permitted by 10CFR51.22(c) (9).