



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 27, 1993

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

Attn: Document Control Desk

Subject: Application for Amendment to Facility Operating
Licenses-Plant Snubber System:

Byron Station Units 1 and 2
NPF-37/66; NRC Docket Nos. 50-454/455

Braidwood Station Units 1 and 2
NPF-72/77; NRC Docket Nos. 50-456/457

Reference: Generic Letter 90-09, "Alternative Requirements For Snubber Visual
Inspection Intervals and Corrective Actions"

Dear Dr. Murley:

Pursuant to 10 CFR50.90, Commonwealth Edison Company (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF 37, NPF 66, NPF 72 and NPF 77. The proposed amendment requests changes to Technical Specification Section 4.7.8 and the bases for Section 3/4.7.8.

The proposed amendment request, using guidance from Generic Letter 90-09, includes: 1) replacement of the existing inspection schedule periods with the reference to Table 4.7-2; 2) change to Section 4.7.8c to allow snubbers which appear to be inoperable to be classified as unacceptable and may be reclassified as acceptable if requirements are met; 3) removal of sample plan and references to Figure 4.7-1; 4) clarify the bases by adding reference to Generic Letter 90-09; and 5) editorial changes.

The amendment request is subdivided as follows:

- Attachment A: Description and Safety Analysis of Proposed Changes
- Attachment B: Proposed Revision to the Technical Specifications for Byron and Braidwood Stations
- Attachment C: Evaluation of Significant Hazards Considerations
- Attachment D: Environmental Assessment

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Dr. Thomas E. Murley

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The proposed changes have been reviewed and approved by the On-site and Off-site Review Committees in accordance with CECo procedures. CECo has reviewed this proposed amendment in accordance with 10 CFR 50.92(c) and has determined that no significant hazards consideration exists.

CECo is notifying the State of Illinois of our application for these amendments by transmitting a copy of this letter and the associated attachments to the designated State Official.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other CECo employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Braidwood is requesting that the proposed amendment be approved prior to the upcoming refuel outage which is currently scheduled for February 26, 1993. Approval of this amendment prior to the refueling outage may result in person-rem savings, if additional inspections were required. Additionally, implementation of the changes outlined in the Generic Letter 90-09 could preclude unnecessary plant shutdowns.

Please address any further comments or questions regarding this matter to this office.

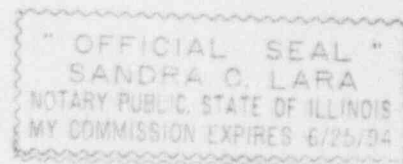
Respectfully,

State of Ill, County of Depp
Signed before me on this 27th day
of August, 1993 by [Signature]
Notary Public [Signature]

[Signature]
Denise M. Saccomando
Nuclear Licensing Administrator

Attachments

cc: J. B. Hickman, Byron Project Manager - NRR
R. R. Assa, Braidwood Project Manager - NRR
H. Peterson, Senior Resident Inspector - Byron
S. G. Dupont, Senior Resident Inspector - Braidwood
B. Clayton, Branch Chief - Region III
Office of Nuclear Facility Safety - IDNS



ATTACHMENT A

Description and Safety of Proposed Changes

Description of the Proposed Changes

The proposed Technical Specification revision provides for an inspection frequency for snubbers that is based on the population size of a type of snubber. This change is being proposed using the guidance provided in NRC Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions." Surveillance requirement 4.7.8 is being modified in a manner consistent with the Generic Letter.

The following are proposed changes to Technical Specification surveillance 4.7.8 for the Plant System Snubbers: (1) Replace the existing inspection schedule periods in 4.7.8b with reference to Table 4.7-2; (2) Change the wording in 4.7.8c to allow snubbers which appear to be inoperable to be classified as unacceptable and reclassified as acceptable if requirements are met; (3) Remove sample plans e.2 and e.3 and remove references to Figure 4.7-1; (4) Clarify the Bases 3/4 7.8 by removing references to Figure 4.7-1 and adding reference to USNRC Generic Letter 90-09; and (5) Editorial changes. The marked up Technical Specification pages of the proposed changes are provided in Attachment B. A discussion of each change follows.

1. **Proposed Changes to Visual Inspection 4.7.8b**

Description and Bases of the Current Requirement

The current visual inspection surveillance requirement provides for increased inspection frequencies based on the total number of inoperable snubbers of each type. One snubber failure requires a 12 month $\pm 25\%$ inspection interval, with additional failures resulting in a proportionally more restrictive inspection interval. The current snubber testing and inspection plan and frequency adjustment are designed to provide a 95% confidence level that at least 90% of the safety related snubbers operate within their specified acceptance limits. The inspection frequency and frequency adjustments are statistically derived independent of snubber population to achieve the above acceptance limits.

Description and Bases of the Requested Revision

The proposed surveillance requirement adds a table that addresses the maximum number of snubber failures that can be tolerated prior to reducing the inspection interval. The amendment request provides for inspection intervals which take the size of the population of a snubber group into account while still providing for the same confidence level, and allows snubber inspections and corrective actions to be performed during refueling outages. This allows the plant to avoid mid-cycle outages due to a small number of snubber failures. This number is a function of the population size of a particular type of snubber. The revised requirement allows the inspection intervals to be compatible with 24 month fuel cycles. Provisions are included to extend the inspection interval up to 48 months. A provision is also included to allow an evaluation to be performed to justify continued operation with a snubber that is unacceptable, without declaring the snubber inoperable and applying the Action Statement.

Also, removal of two obsolete footnotes is requested from the subsequent visual inspection periods. The first states the inspection interval of each type of snubber shall not be lengthened more than one step at a time unless a generic problem has been identified and corrected; in that event, the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found. The inspection interval will no longer be lengthened if any generic problems are identified and corrected. The proposed inspection intervals will be based on population and category size, and the number of unacceptable snubbers found.

The second footnote states the provisions of specification 4.0.2 are not applicable. This statement disallowed the maximum allowable surveillance extension of 25% of the specified surveillance interval. Removal of the restriction will allow the 25% extension to be utilized as required. This is consistent with the Generic Letter 90-09; the restriction is no longer required.

Additionally, removal of an obsolete footnote is requested from Byron Tech Spec page 3/4 7-22, which states the visual inspection of the inaccessible snubbers for Unit 1, Cycle 3 must be completed by January 24, 1990. The visual inspection of the inaccessible snubbers was performed and the footnote is no longer required.

Impact of the Proposed Change

The revised surveillance requirement continues to provide a statistically derived confidence level that a high percentage of the installed snubbers are capable of performing their intended function. This ensures that the systems on which the snubbers are installed will perform their design function.

2. Visual Inspection Acceptance Criteria 4.7.8c

Description and Bases of the Current Requirement

The visual inspection acceptance criteria allows snubbers which appear inoperable as a result of visual inspection to be determined OPERABLE for the purposes of establishing the next inspection interval if provisions of 4.7.8c (1) and (2) are met. Provision (1) states, "the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers;" and (2) "the affected snubber is functionally tested in the as-found condition and determined OPERABLE per surveillance 4.7.8f." The current surveillance requirement states the snubber is inoperable unless the provisions of (1) and (2) are satisfied.

Description and Bases of the Requested Revision

A requirement is added to 4.7.8c to require a documented review and evaluation to justify continued operation with an inoperable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met. This will provide a method to review and evaluate inoperable snubbers by performing an engineering evaluation. The evaluation documentation will allow justified continued operation.

Impact of the Proposed Change

The changes do not affect the systems' or the support systems' ability to perform their safety functions. The change allows corrective action with the same confidence level as currently provided.

3. Functional Tests 4.7.8c

Description and Bases of the Current Requirement

Sample plans e.2 and e.3 discuss the use of Figure 4.7-1. This figure is a graphical representation of the present testing frequency scope. It provides a curve of the total number of snubbers of a type found not meeting the acceptance requirements versus the total number of snubbers tested. The intersection of the curves determines whether to Accept, Continue Testing, or Reject. Also, an administrative requirement is included that states that the NRC Regional Administrator shall be notified in writing of the sample plan selected for each snubber type prior to the test period or the sample plan used in the prior test period shall be used. This requirement clarifies for the Regional Administrator which sample plan is selected for each snubber type prior to the period.

Description and Bases of the Requested Revision

The proposed amendment removes sample plans e.2 and e.3. The proposed change requires performance of functional tests at least once per 18 months during shutdown. At least 10% of the total number of each type of snubber shall be functionally tested either in-place or in a bench test. For all snubbers that do not meet the acceptance criteria, an additional 10% will be done until all snubbers of that type have been functionally tested.

The proposed change removes the requirement to notify the NRC Regional Administrator in writing of the sample plan selected for each snubber type prior to the test period. This requirement is no longer necessary because only the functional testing method is used.

Impact of the Proposed Change

The change does not affect any accident analyses because the proposed schedule continues to meet the original analyses. As long as the proposed schedule remains intact, the analyses remain bounding.

4. **Proposed Changes to the Bases for B 3/4.7.8**

Description and Bases of the Current Requirement

The current Bases includes discussions of the testing methods. Inspections performed before the required test interval has elapsed, may be used as a new reference point to determine the next inspection date. The results of an early inspection performed before the original required elapsed time interval (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will over-ride the previous schedule. The inspections may be done prior to the required time, but are not allowed to lengthen the required inspection interval.

The Bases includes a discussion of the three functional testing methods, two of which will no longer be applicable: (a) Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7-1; and (b) Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation. Figure 4.7-1 was developed using Wald's Sequential Probability Ratio Plan. These items are included to clarify the functional testing methods allowed and how they were developed.

Description and Bases of the Requested Revision

The proposed change replaces the existing inspection schedule periods with a reference to Table 4.7-2, "Snubber Visual Inspection Interval." Table 4.7-2 is stated verbatim from the Generic Letter and provides a direct method for determining the snubber test population. Also, a reference to USNR Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions" was added. This provides information on the existing functional testing methods. The second and third functional testing methods are removed.

Impact of the Proposed Change

The changes to the bases section are required to match the changes proposed to the snubber surveillances and serve to improve readability. The proposed wording changes more accurately reflect how this Technical Specification will be adhered to. The proposed changes do not result in any physical change to the plant which could cause an increase in the probability or consequences of any previously evaluated accident.

5. Editorial Changes

Description and Bases of the Requested Revision

1. Change the Index for Figure 4.7-1 on page X, to state "This Figure Not Used". This will clarify the figure is not presently used, but was previously required. Add Table 4.7-2 "Snubber Visual Inspection Interval" to page X to reflect addition of table within the Technical Specification. The change is administrative and requires no further review.
2. Change the second sentence in Surveillance Requirements Visual Inspections 4.7.8b, from snubber "groups" to "categories". This change will match the Generic Letter verbatim. The term is used to specify accessible or inaccessible snubbers. The change is administrative only.
3. Change the last sentence of Visual Inspection Acceptance Criteria 4.7.8c by adding the word "found" after "All snubbers". Also, change the word "inoperable" to the word "unacceptable". These changes will match the Generic Letter 90-09. The word "found" was omitted previously. The term "unacceptable" will match the Generic Letter and is an administrative change.
4. Add to Figure 4.7-1, "This figure not used". This will clarify that the figure is no longer needed, but was previously on this page.

5. Remove from the Bases, (page B 3/4 7-6 for Byron and page B 3/4 7-5 for Braidwood), "one of three functional testing methods are used with the stated acceptance criteria: Functionally test". After the word reliability add "at least 10% of each type of shall be functionally tested at least once per 18 months with an additional 10% tested for each functional testing failure." This will help clarify the sentence without changing its meaning.

Impact of the Proposed Change

The changes are administrative in nature, and do not reduce the requirements of the Technical Specifications. They improve readability, and provide consistency with Generic Letter 90-09.

Schedule Requirements

Braidwood is requesting that the proposed amendment be approved prior to the upcoming refuel outage which is currently scheduled for February 26, 1993. Approval of this amendment prior to the refueling outage may result in person-rem savings, if additional inspections were required. Additionally, implementation of the changes outlined in the Generic Letter 90-09 could preclude unnecessary plant shutdowns.

Identification and Discussion of Any Irreversible Consequences

The proposed changes implement the USNRC Generic Letter 90-09. No irreversible consequences will result from the proposed changes.