



Commonwealth Edison
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January 20, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Proposed Technical Specifications
NRC Docket Nos. 50-454, 50-455,
50-456, and 50-457

Dear Mr. Denton:

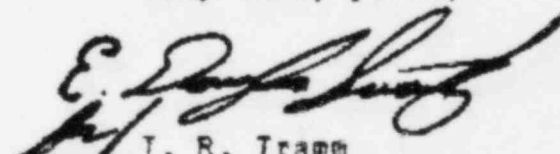
Enclosed for your immediate consideration and review are the Commonwealth Edison Company proposed Technical Specifications for our Byron Station Unit 1.

The Attachment to this letter describes the bases used to develop our proposed Technical Specifications. Additionally, it provides both general and specific justifications for our proposed changes from the standardized tech specs. It should be noted, however, that while the attached Technical Specifications are proposed for our Byron Unit 1, we believe that these Technical Specifications will ultimately apply to our Byron Unit 2 and Braidwood Units 1 and 2 with minor modifications.

A meeting in the near future with your Staff to discuss our proposed Technical Specifications is hereby requested upon their receipt of same.

Fifteen (15) copies of this letter with Attachment and proposed Byron Unit 1 Technical Specifications are provided for your review. The signed original is being transmitted under separate cover.

Very truly yours,


T. R. Tramm
Nuclear Licensing Administrator

EDS/lm

Attachment

cc: J. G. Keppler - RIII wo/Att
L. N. Olshan wo/Att
Region III Inspector - Byron wo/Att

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ATTACHMENT A

Proposed Byron Unit 1 Technical Specifications

A. Development

The proposed Byron Unit 1 Technical Specifications are based on Standard Technical Specifications for Westinghouse PWR's, Revision 4 (NUREG-0452). Included are specifications for the control of radiological effluents based on Radiological Effluent Technical Specifications for PWR's, Revision 3 (NUREG-0472). Additionally included are the standard Commonwealth Edison nuclear station administrative controls such as presented in Section 6 of Technical Specifications, LaSalle County Station, Unit 1 (NUREG-0861).

B. Proposed Generic Changes Applied to Base Documents

1. It is proposed to eliminate lengthy, non-operational provisions from the technical specifications and relegate these areas to administrative controls. An example is a listing of approximately 2500 snubbers. Two arguments support this proposal. This would complete those aspects of human engineering already applied to the control boards and operating/emergency procedures. Additionally, it is consistent with the proposal to split technical specifications into an operational portion and supplemental portion.
2. It is proposed to extend action statement durations to 7 days from 72 hours. This is consistent with the provisions of the Zion Nuclear Power Station Technical Specifications. Zion station is the reference plant design for Byron/Braidwood stations and has justified the adequacy of the 7 day provision in the Zion Probabilistic Safety Study (Dockets No. 50-295/304).

3. Explanation of Individual Proposed Changes

0.0 Index

Revised to incorporate the requested index of Tables and Figures.

1.0 Definitions

Revised to include three additional nuclear definitions for clarity and ten definitions to support Radiological Effluent Tech Specs (RETS).

2.0 Safety Limits and Settings

Revised to reflect current Westinghouse Precautions, Limitations and Setpoints (PLS) Document for Byron/Braidwood Plant design and optimized fuel. Allowable values to be provided later (February 1983) pending receipt of Westinghouse statistical setpoint study.

3/4.1 and 2 - Reactivity Control and Power Destrubutions

Revised to reflect Byron/Braidwood Plant design, optimized fuel and Safety Evaluation Report (NUREG - 0876) commitments.

3/4.3 - Instrumentation

Revised to reflect Byron/Braidwood plant design, Westinghouse PLS document, and the instrumentation required to support RETS. Allowable values to be provided later (February 1983) pending receipt of Westinghouse statistical setpoint study.

3/4.4 - Reactor Coolant System

Revised to reflect Byron/Braidwood plant design. The specification regarding \bar{E} has been deleted and replaced by a specification limiting specific coolant activity. This is proposed because of the following reasons. According to the bases (3/4.4.8), the activity of the coolant is to be kept low enough to assure doses at the site boundary are below 10 CFR limits. The bases refer to why iodine measurements make this assurance. Additionally, during a fuel failure accident, the iodine limit proposed would in all cases be exceeded prior to reaching an E limit. Should an impurity ingress accident occur, operation would be limited or suspended by coolant chemistry specifications. Therefore the six month \bar{E} specification would never be limiting and is subsequently unnecessary.

3/4.5 - Emergency Core Cooling Systems

Revised to reflect Byron/Braidwood plant design and incorporate the generic proposal for a 7 day action statement for one inoperable subsystem.

3/4.6 - Containment

Revised to reflect the Byron/Braidwood atmospheric containment design.

3/4.7 - Plant Systems

Revised to reflect the Byron/Braidwood plant design. The specification for the Ultimate Heat Sink (3/4.7.5) will be provided later (February 1983). It is proposed that the list of snubbers be handled administratively through the "Inservice Inspection Program Plan for Snubbers" to eliminate specifications unnecessary for immediate operation control. This is in-line with the proposed splitting of Tech Specs into an operational and supplemental portion. It additionally contributes to human engineering the specifications as required of operating and emergency procedures.

3/4.8 - Electrical

The entire section is revised and reworded to reflect the unique Byron/Braidwood electrical design and promote clarity in an otherwise less than concise subsection of the Standard Technical Specifications.

3/4.9 - Refueling Operations

Revised to reflect Byron/Braidwood design and incorporate the Tech Spec features allowed Zion station (Equipment hatch open during core alterations).

3/4.10 - Special Test Exceptions

Revised to reflect Byron/Braidwood plant design.

- and 3/4.11 - Radioactive Effluents
3/4.12 - Radiological Environmental Monitoring

Sections added to incorporate RETS.

5. Design Features

Rev'd to reflect Byron/Braidwood plant design features.

6. Administrative Controls

Section added is the standard Commonwealth Edison nuclear station administrative controls and incorporates SER commitments.