

ATTACHMENT B

PROPOSED CHANGES TO APPENDIX A  
TECHNICAL SPECIFICATIONS FOR FACILITY  
OPERATING LICENSES NPF-37, NPF-66, NPF-72 AND NPF-77

Byron

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TABLE 3.3-6

## RADIATION MONITORING INSTRUMENTATION FOR PLANT OPERATIONS

FUNCTIONAL UNIT	CHANNELS TO TRIP/ALARM	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ALARM/TRIP SETPPOINT	ACTION
1. Fuel Building Isolation- Radioactivity-High and Criticality (ORE-AR055/56)	1	2	*	<5 mR/h	29
2. Containment Isolation- Containment Radioactivity- High					
a) Unit 1 (1RE-AR011/12)	1	2	All	**	26
b) Unit 2 (2RE-AR011/12)	1	2	All	**	26
3. Gaseous Radioactivity- RCS Leakage Detection					
a) Unit 1 (1RE-PR011B)	N.A.	1	1, 2, 3, 4	N.A.	28
b) Unit 2 (2RE-PR011B)	N.A.	1	1, 2, 3, 4	N.A.	28
4. Particulate Radioactivity- RCS Leakage Detection					
a) Unit 1 (1RE-PR011A)	N.A.	1	1, 2, 3, 4	N.A.	28
b) Unit 2 (2RE-PR011A)	N.A.	1	1, 2, 3, 4	N.A.	28
5. Main Control Room Isolation- Outside Air Intake-Gaseous Radioactivity-High					
(ORE-PR031B/32B and ORE-PR033B/34B)	1	2 per	All	< 2 mR/h	27 <sup>9</sup>
a) Train A (ORE-PR031B/32B)	1	2 intake <sup>2</sup>	All	< 2 mR/h	27
b) Train B (ORE-PR033B/34B)	1	2	All	< 2 mR/h	27

## TABLE NOTATIONS

- \*With new fuel or irradiated fuel in the fuel storage areas or fuel building.
- \*\*Trip Setpoint is to be established such that the actual submersion dose rate would not exceed 10 mR/hr in the containment building. For containment purge or vent the Setpoint value may be increased up to twice the maximum concentration activity in the containment determined by the sample analysis performed prior to each release in accordance with Table 4.11-2 provided the value does not exceed 10% of the equivalent limits of Specification 3.11.2.1.a in accordance with the methodology and parameters in the ODCM.

## ACTION STATEMENTS

- ACTION 26 - With less than the Minimum Channels OPERABLE requirement, operation may continue provided the containment purge valves are maintained closed.
- ACTION 27 - With the number of OPERABLE channels ~~one~~ less than the Minimum Channels OPERABLE requirement, within 1 hour isolate the Control Room Ventilation System and initiate operation of the Control Room Make-up System.
- ACTION 28 - Must satisfy the ACTION requirement for Specification 3.4.6.1.
- ACTION 29 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, ACTION a. of Specification 3.9.12 must be satisfied. With both channels inoperable, provide an appropriate portable continuous monitor with the same Alarm Setpoint in the fuel pool area with one Fuel Handling Building Exhaust filter plenum in operation. Otherwise satisfy ACTION b. of Specification 3.9.12.

switch to the redundant train of Control Room Ventilation, provided the redundant train meets the Minimum Channels OPERABLE requirement or

Restore the inoperable monitors to OPERABLE status within 30 days or submit a Special Report to the Commission pursuant to Specification 6.9.2 within the following 30 days that provides the Cause of the inoperability and the plans for restoration.

~~#Satisfaction of Specification 3.9.12 ACTIONS are not required prior to July 1, 1985 when there is no irradiated fuel in the storage pool.~~

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION FOR PLANT  
OPERATIONS SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	DIGITAL CHANNEL OPERATIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
1. Fuel Building Isolation- Radioactivity-High and Criticality (ORE-AR055/56)	S	R	M	*
2. Containment Isolation- Containment Radioactivity- High				
a) Unit 1 (1RE-AR011/12)	S	R	M	All
b) Unit 2 (2RE-AR011/12)	S	R	M	All
3. Gaseous Radioactivity- RCS Leakage Detection				
a) Unit 1 (1RE-PR011B)	S	R	M	1, 2, 3, 4
b) Unit 2 (2RE-PR011B)	S	R	M	1, 2, 3, 4
4. Particulate Radioactivity- RCS Leakage Detection				
a) Unit 1 (1RE-PR011A)	S	R	M	1, 2, 3, 4
b) Unit 2 (2RE-PR011A)	S	R	M	1, 2, 3, 4
5. Main Control Room Isolation- Outside Air Intake-Gaseous Radioactivity-High (ORE-PR031B/32B and ORE-PR033B/34B)	S	R	M	All
a) Train A (ORE-PR031B/32B)				
b) Train B (ORE-PR033B/34B)	S	R	M	All

\*With new fuel or irradiated fuel in the fuel storage areas or fuel building.

The specified 18 month interval may be extended to 32 months for Cycle 1 only.

## INSTRUMENTATION

### 3/4.3.3 MONITORING INSTRUMENTATION

#### RADIATION MONITORING FOR PLANT OPERATIONS

##### LIMITING CONDITION FOR OPERATION

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3.3.3.1<sup>X</sup> The radiation monitoring instrumentation channels for plant operations shown in Table 3.3-6 shall be OPERABLE with their Alarm/Trip Setpoints within the specified limits.

APPLICABILITY: As shown in Table 3.3-6.

##### ACTION:

- a. With a radiation monitoring channel Alarm/Trip Setpoint for plant operations exceeding the value shown in Table 3.3-6, adjust the Setpoint to within the limit within 4 hours or declare the channel inoperable.
- b. With one or more radiation monitoring channels for plant operations inoperable, take the ACTION shown in Table 3.3-6.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

##### SURVEILLANCE REQUIREMENTS

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4.3.3.1 Each radiation monitoring instrumentation channel for plant operations shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and DIGITAL CHANNEL OPERATIONAL TEST for the MODES and at the frequencies shown in Table 4.3-3.

~~\*Control Room isolation not required prior to initial criticality on Cycle 1.~~

TABLE 3.3-6

## RADIATION MONITORING INSTRUMENTATION FOR PLANT OPERATIONS

FUNCTIONAL UNIT	CHANNELS TO TRIP/ALARM	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ALARM/TRIP SETPOINT	ACTION
1. Fuel Building Isolation- Radioactivity-High and Criticality (ORE-AR055/56)	1	2	*	<5 mR/h	29
2. Containment Isolation- Containment Radioactivity- High					
a) Unit 1 (1RE-AR011/12)	1	2	All	**	26
b) Unit 2 (2RE-AR011/12)	1	2	All	**	26
3. Gaseous Radioactivity- RCS Leakage Detection					
a) Unit 1 (1RE-PRO11B)	N.A.	1	1, 2, 3, 4	N.A.	28
b) Unit 2 (2RE-PRO11B)	N.A.	1	1, 2, 3, 4	N.A.	28
4. Particulate Radioactivity- RCS Leakage Detection					
a) Unit 1 (1RE-PRO11A)	N.A.	1	1, 2, 3, 4	N.A.	28
b) Unit 2 (2RE-PRO11A)	N.A.	1	1, 2, 3, 4	N.A.	28
5. Main Control Room Isolation- Outside Air Intake-Gaseous Radioactivity-High					
<del>(ORE-PRO31B/32B and ORE-PRO33B/34B)</del>	<del>1</del>	<del>2 per</del>	<del>All</del>	<del>&lt; 2 mR/h</del>	<del>27</del>
a) Train A (ORE-PA031B/32B)	1	<del>intake</del> 2	All	≤ 2 mR/h	27
b) Train B (ORE-PRO33B/34B)	1	2	All	≤ 2 mR/h	27



## TABLE NOTATIONS

- \*With new fuel or irradiated fuel in the fuel storage areas or fuel building.
- \*\*Trip Setpoint is to be established such that the actual submersion dose rate would not exceed 10 mR/hr in the containment building. For containment purge or vent the Setpoint value may be increased up to twice the maximum concentration activity in the containment determined by the sample analysis performed prior to each release in accordance with Table 4.11-2 provided the value does not exceed 10% of the equivalent limits of Specification 3.11.2.1.a in accordance with the methodology and parameters in the ODCM.

## ACTION STATEMENTS

- ACTION 26 - With less than the Minimum Channels OPERABLE requirement, operation may continue provided the containment purge valves are maintained closed.
- ACTION 27 - With the number of OPERABLE channels ~~one~~ less than the Minimum Channels OPERABLE requirement, within 1 hour isolate the Control Room Ventilation System and initiate operation of the Control Room Make-up System.
- ACTION 28 - Must satisfy the ACTION requirement for Specification 3.4.6.1.
- ACTION 29 - With the number of OPERABLE channels ~~one~~ less than the Minimum Channels OPERABLE requirement, ACTION a. of Specification 3.9.12 ~~X~~ must be satisfied. With both channels inoperable, provide an appropriate portable continuous monitor with the same Alarm Setpoint in the fuel pool area with one Fuel Handling Building Exhaust filter plenum in operation. Otherwise satisfy ACTION b. of Specification 3.9.12. ~~X~~

Switch to the redundant train of Control Room Ventilation, provided the redundant train meets the Minimum Channels OPERABLE requirement, or

Restore the inoperable monitors to OPERABLE status within 30 days or submit a Special Report to the Commission pursuant to Specification 6.9.2 within the following 30 days that provides the cause of the inoperability and the plans for restoration.

~~# Satisfaction of Specification 3.9.12 ACTIONS a. and b. not required prior to initial operation at  $\geq$  5% Rated Thermal Power on Cycle 1.~~

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION FOR PLANT  
OPERATIONS SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	DIGITAL CHANNEL OPERATIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
1. Fuel Building Isolation- Radioactivity-High and Criticality (ORE-ARO55/56)	S	R#	M	*
2. Containment Isolation- Containment Radioactivity- High				
a) Unit 1 (1RE-ARO11/12)	S	R#	M	All
b) Unit 2 (2RE-ARO11/12)	S	R#	M	All
3. Gaseous Radioactivity- RCS Leakage Detection				
a) Unit 1 (1RE-PRO11B)	S	R#	M	1, 2, 3, 4
b) Unit 2 (2RE-PRO11B)	S	R#	M	1, 2, 3, 4
4. Particulate Radioactivity- RCS Leakage Detection				
a) Unit 1 (1RE-PRO11A)	S	R#	M	1, 2, 3, 4
b) Unit 2 (2RE-PRO11A)	S	R#	M	1, 2, 3, 4
5. Main Control Room Isolation- Outside Air Intake-Gaseous Radioactivity-High ( <del>ORE-PRO31B/32B</del> <del>and ORE-PRO33B/34B</del> )	S	R#	M	All
a) Train A ( <del>ORE-PRO31B/32B</del> )				
b) Train B ( <del>ORE-PRO33B/34B</del> )	S	R	M	All

\*With new fuel or irradiated fuel in the fuel storage areas or fuel building.

#The specified 18 month interval may be extended to 32 months for cycle 1 only.



## ATTACHMENT C

### EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

- 1) Involve a significant increase in the probability or consequences 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 proposed change does not result in a significant increase in the probability or consequence of accidents previously evaluated. The radiation monitors are designed to provide a response to a radiological incident. The operability of these monitors does not factor into the sequence of events required for a radiological release to the atmosphere to occur. They serve to initiate action to prevent a release from unacceptably impacting the Control Room; they do not prevent a release from occurring.

The subject radiation monitors function to isolate the Control Room Ventilation System (VC) outside air intakes in the event of a high radiation condition. Each train of the VC system is provided with redundant radiation monitors. Only one train of VC is operated at a time. The proposed change would allow the operation of a train of VC with a full complement of radiation monitors in the normal configuration. Assuming a limiting scenario of the plant operating with degraded monitoring on the Idle VC train with the occurrence of radioactive release and subsequent failure of the running train, the idle train could be started. The train would still have a single radiation monitor available or already be aligned in the emergency mode per system design. If the initiating event resulted in a Safety Injection signal, the ventilation system would automatically align to the post-accident mode. This provides a diverse means of providing radiological protection for the Control Room. The proposed change does not alter the manner in which the actuation signal is provided, nor does it have an impact on the response of the VC system to a valid actuation signal.

The proposed change does not create the possibility for a new or different kind of accident from any accident previously evaluated. The proposed change does not introduce any new or different equipment, and it will not result in installed equipment being operated in a new or different manner. The change will allow the operation of a fully operable train of VC, rather than require that a train with degraded monitoring be operated in its post-accident configuration. The monitors are designed to fail in a safe condition, so required system configuration or operation are not precluded.

The proposed change does not involve a significant reduction in a margin of safety. The proposed change allow the operation of a VC train with full radiation monitoring capability. In the event there is one monitor per train inoperable, the change does not render the plant vulnerable to a single failure which would result in the overexposure of control room personnel. Additionally, the Control Room is equipped with Area Radiation Monitors which provide an alarm upon detection of a high radiation condition. As such, sufficient means will remain available to ensure that the VC system is capable of being both automatically and manually aligned to provide for the mitigation of radiological events.