



Commonwealth Edison

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October 4, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20005

SUBJECT: Byron Generating Station Units 1 and 2 Technical Specifications
NRC Docket Nos. 50-454 and 50-455

Dear Mr. Denton:

In accordance with our review of the September 24, 1984 deferral letter from L.O. Del George to Harold R. Denton, we have currently identified certain Tech Specs which require interim Tech Specs based on the granting of the deferral. Those currently identified are included as attachments to this letter.

Each interim Tech Spec is worded to be consistent with the MODES and time requirements as discussed in the deferral letter.

Very truly yours,

Dennis L. Farrar
Director, Nuclear Licensing

cc: NRC Senior Resident Inspector - Byron

Lenny Olshan

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INTERIM TECHNICAL SPECIFICATION # 1

SYSTEM: MS Main Steam MSIV's

DESCRIPTION: MSIV's (1MS001A-D) drift open

STATUS: End of cycle position switches have been adjusted, retest remains.

TECH SPEC APPLICABILITY: Mode 3

COMPLETION REQUIRED PRIOR TO: Initial Criticality (Mode 2)

BASIS: Fission product inventory and resultant effluent are within radiological release limits up to an equivalent of 10 full power days of operation not exceeding 25% power. Additional details are contained in October 27, 1983, letter from T. R. Tramm to H. R. Denton.

Oct 4, 1984
~~At 6:00~~

FINAL DRAFT

PLANT SYSTEMS

MAIN STEAM LINE ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.7.1.5* Each main steam line isolation valve (MSIV) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

MODE 1:

With one MSIV inoperable but open, POWER OPERATION may continue provided the inoperable valve is restored to OPERABLE status within 4 hours; otherwise be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

MODES 2 and 3:

With one MSIV inoperable, subsequent operation in MODE 2 or 3 may proceed provided the isolation valve is maintained closed. The provisions of Specification 3.0.4 are not applicable. Otherwise, be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.5 Each MSIV shall be demonstrated OPERABLE by verifying full closure within 5 seconds when tested pursuant to Specification 4.0.5. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3.

* Not required before initial criticality on Cycle 1.

INTERIM TECHNICAL SPECIFICATION # 2

SYSTEM: VC Control Room Ventilation

DESCRIPTION: Control room boundary differential pressure of 1/8 in. water gauge not achieved

STATUS: 1/8 in. water gauge differential pressure with respect to ambient has been established during operation of redundant Train B. Train A balancing damper adjustments in process. A 1/8 in. water gauge differential relative to auxiliary building surrounding areas requires the auxiliary building ventilation system (VA).

TECH SPEC APPLICABILITY:

Mode 6

COMPLETION REQUIRED PRIOR TO:

For Train A, 1/8 in. water gauge differential with respect to ambient will be complete prior to initial criticality (Mode 2). For Train a and B, 1/8 in. water gauge differential with respect to surrounding areas will be obtained prior to accumulating 10 effective full power days at power levels not exceeding 25% power.

BASIS: Fission product inventory is trivial in comparison to the inventories employed by FSAR Safety Analysis, and therefore, will not threaten Control Room habitability. See October 27, 1983 letter from T.R. Tramm to H. R. Denton.

AUG 29 1984

FINAL DRAFT

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:

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, 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 make-up mode.
- b. With both Control Room Ventilation Systems inoperable, or with the OPERABLE Control Room Ventilation System, required to be in the make-up 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.

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 HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the duct heaters operating;
- 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 make-up system filter plenum by:

* Not required before initial criticality on cycle 1.

Aug 20 1984

PLANT SYSTEMS

FINAL DRAFT

3/4.7.6 CONTROL ROOM VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6 ^{* One} ~~Two independent~~ Control Room Ventilation System~~s~~ shall be OPERABLE.

APPLICABILITY: ~~All MODES:~~ 3, 4, 5, 6

ACTION:

MODES ~~1, 2,~~ 3 and 4:

With ^{the} ~~one~~ Control Room Ventilation System inoperable, restore the inoperable system to OPERABLE status within ~~7 days~~ ^{4 hours} 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, 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 make-up mode.~~
- a. ^{the} ~~With both~~ Control Room Ventilation System~~s~~ inoperable, ~~or with the OPERABLE Control Room Ventilation System, required to be in the make-up 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.~~

SURVEILLANCE REQUIREMENTS

^{The} 4.7.6 ~~Each~~ Control Room Ventilation System shall be demonstrated OPERABLE:

- At least once per 12 hours by verifying that the control room air temperature is less than or equal to 90°F;
- At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal, adsorbers and verifying that the system operates for at least 10 continuous hours with the duct heaters operating;
- 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 make-up system filter plenum by:

* Applicable only before initial criticality on Cycle 1.

SURVEILLANCE REQUIREMENTS (Continued)

- 3) * Verifying that the Make-up System maintains the control room at a positive nominal pressure or greater than or equal to 1/8 inch Water Gauge relative to ambient pressure in areas adjacent to this Control Room Area and
- 4) Verifying that the heaters dissipate 27.2 ± 2.7 kW when tested in accordance with ANSI N510-1975.
- f. After each complete or partial replacement of a HEPA filter bank, by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1975 for a DOP test aerosol while operating the system at a flow rate of $6000 \text{ cfm} \pm 10\%$ for the Make-up System; and
- g. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1975 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of $6000 \text{ cfm} \pm 10\%$ for the Make-up System.

* Prior to Ten Effective Full Power Days or 25% power (Cycle 1), this surveillance requirement is

3) Verifying that the make-up System maintains the Control Room at a positive pressure with respect to all adjacent areas

INTERIM TECHNICAL SPECIFICATION # 3

SYSTEM: VA Auxiliary Building Ventilation

DESCRIPTION: OPERABILITY of Exhaust Filter System not required
at Fuel Load

STATUS: Under Construction

TECH SPEC APPLICABILITY: Modes 1, 2, 3, and 4

COMPLETION REQUIRED PRIOR TO: Ten full power days of operation, not
exceeding 25% of full power

BASIS: Fission product inventory and resultant gaseous effluent
are within radiological release limits up to an equivalent
of ten full power days of operation, not exceeding 25% of
full power. Additional details contained in October 27, 1983,
letter from T. R. Tramm to H. R. Denton.

3.4.7.7 NON-ACCESSIBLE AREA EXHAUST FILTER PLENUM VENTILATION SYSTEM

SEP 12 1984

LIMITING CONDITION FOR OPERATION

SEP 12 1984

3.7.7* Three independent non-accessible area exhaust filter plenums (50% capacity each) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one non-accessible area exhaust filter plenum inoperable, restore the inoperable plenum 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.

SURVEILLANCE REQUIREMENTS

4.7.7 Each non-accessible area exhaust filter plenum shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating; from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that operation occurs for at least 15 minutes;
- b. 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 exhaust filter plenum by:
 - 1) Verifying that the exhaust filter plenum satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1.0% when using 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 flow rate is 66,900 cfm \pm 10%;
 - 2) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample from each filter obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978, when the average of the methyl iodide penetration for the three samples is less than 7.1%;

* Not applicable until Ten Effective Full Power Days or exceeding 25% power (Cycle 1 only).

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 - After Ten Effective Full Power Days or 25% Power (Cycle 1 only), 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 and satisfy ACTION b. of Specification 3.9.12 with one Fuel Handling Building Exhaust filter plenum in operation. Otherwise satisfy ACTION b. of Specification 3.9.12.

-Prior to Ten Effective Full Power Days or 25% power (Cycle 1 only), with the number of OPERABLE channels one less than the minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 72 hours, or provide an appropriate portable continuous monitor with the same alarm setpoint in the fuel pool area. With both channels inoperable, provide an appropriate portable continuous monitor with the same alarm setpoint in the fuel pool area, or suspend all operations involving movement of fuel within the storage pool and crane operation with loads over the storage pool.

FINAL DRAFT

REFUELING OPERATIONS

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

AUG 28 1984

LIMITING CONDITION FOR OPERATION

3.9.4 The containment building penetrations shall be in the following status:

- a. The personnel hatch should have a minimum of one door closed at any one time and the equipment hatch shall be in place and held by a minimum of four bolts, or the equipment hatch removed pursuant to Surveillance Requirement 4.9.4.2.
- b. A minimum of one door in the personnel emergency exit hatch is closed, and
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:
 - 1) Closed by an isolation valve, blind flange, or manual valve, or
 - 2) Capable of being closed by an OPERABLE automatic containment purge isolation valve.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

SURVEILLANCE REQUIREMENTS

4.9.4.1 Each of the above required containment building penetrations shall be determined to be either in its closed/isolated condition or capable of being closed by an OPERABLE automatic containment purge isolation valve within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building by:

- a. Verifying the penetrations are in their closed/isolated condition, or
- b. Testing the containment purge isolation valves per the applicable portions of Specification 4.6.3.2.

4.9.4.2 See Insert

4.9.4.2^{*} Verify that the Fuel Handling Building Exhaust Filter Plenums maintain the Fuel Building at a negative pressure of greater than or equal to 1/4 inch water gauge relative to the outside atmosphere with the equipment hatch removed,

- a. Prior to CORE ALTERATIONS or movement of irradiated fuel and
- b. At least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel

Verification of negative pressure will be performed with systems in the normal REFUELING MODE.

* Not applicable until Ten Effective Full Power Days or exceeding 25% power (Cycle 1 only).