



Commonwealth Edison

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April 8, 1985

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

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

References (a): February 20, 1985 letter from T. R.
Tramm to H. R. Denton

(b): February 21, 1985 letter from Cecil O.
Thomas to J. J. Sheppard

Dear Mr. Denton:

This letter provides confirmation of actions which will be taken in the implementation of revised Technical Specification requirements for testing of the Byron reactor protection system instrumentation. At the request of the NRC Staff, this letter revises our commitment to the review of analog channel results operational surveillance test results for the purpose of identifying possible common mode failures.

In reference (a), Commonwealth Edison agreed to a one-year review of instruments subject to quarterly analog operational testing for possible common mode failures. Subsequently, the NRC issued in reference (b) their generic SER on WCAP-10271, which contained the technical basis for the requested change in test frequency. After reviewing that SER, we now understand that the NRC's issuance of the revised Technical Specifications mode is conditional upon implementation of a slightly different common mode failure review program. Accordingly, our commitment is therefore being revised.

The plant procedure for review of deviation reports will be revised. Completion of deviation reports resulting from quarterly analog channel testing will require an evaluation of the failure to determine if that failure could be a common cause failure. The procedure will require testing of the other channels of like function if the failure is determined to be a plausible common cause failure.

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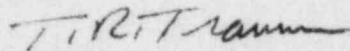
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For the purposes of this evaluation a common cause failure will be defined as a failure which indicates a systematic deficiency in the design, fabrication, testing, or operation of a system which would be likely to result in the simultaneous failure of redundant systems to fulfill their intended safety function. Instrument drift and power failure to a single channel are understood to be examples of failures which are not common cause failures.

We understand that the Westinghouse Owner's Group subcommittee responsible for WCAP-10271 will be issuing guidance for implementing the Technical Specification changes in accordance with the NRC's SER. Additional revisions of our commitments may be necessary when that guidance is received.

One signed original and fifteen copies of this letter are provided for NRC review.

Very truly yours,



T. R. Tramm
Nuclear Licensing Administrator

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