



March 28, 1996

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Supplement to the Application for Amendment to Appendix A,
Technical Specifications, for Facility Operating Licenses:

Byron Nuclear Power Station, Units 1 and 2
Facility Operating Licenses NPF-37 and NPF-66
NRC Docket Nos. 50-454 and 455

Braidwood Nuclear Power Station, Units 1 and 2
Facility Operating Licenses NPF-72 and NPF-77
NRC Docket Nos. 50-456 and 50-457

Incorporation of 10CFR50, Appendix J, Option B

- References:
1. Harold D. Pontious, Jr. (ComEd) letter to NRC Document Control Desk, "Application for Amendment to Appendix A, Technical Specifications, for Facility Operating Licenses NPF-37, NPF-66, NPF-72, and NPF-77 regarding Incorporation of 10CFR50, Appendix J, Option B", dated December 6, 1995
 2. Teleconference between P. Piet, et.al. (ComEd) and J. B. Hickman (NRC) held on February 22, 1996
 3. Harold D. Pontious, Jr. (ComEd) letter to NRC Document Control Desk, "Supplement to the Application for Amendment to Appendix A, Technical Specifications, for Facility Operating Licenses NPF-37, NPF-66, NPF-72, and NPF-77 regarding Incorporation of 10CFR50, Appendix J, Option B", dated February 27, 1996
 4. Teleconference between M. Lesniak, et.al. (ComEd) and G. F. Dick (NRC) held on March 27, 1996

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In Reference (1), Commonwealth Edison Company (ComEd) proposed to amend Appendix A, Technical Specifications, for Facility Operating Licenses NPF-37, NPF-66, NPF-72, and NPF-77 for Byron Nuclear Power Station, Units 1 and 2 (Byron) and Braidwood Nuclear Power Station, Units 1 and 2 (Braidwood), respectively, pursuant to Title 10, Code of Federal Regulations, Part 50, Section 90 (10CFR50.90). ComEd proposed to revise Technical Specification Section 3/4/6.1, "Primary Containment," to incorporate the requirements of the revised 10CFR50, Appendix J, "Primary Reactor

Containment Leakage Testing for Water-Cooled Power Reactors," which became effective on October 26, 1995. Specifically, ComEd proposed to implement 10CFR50, Appendix J, Option B, which allows use of performance based surveillance frequencies for Type A, B, and C tests, rather than predetermined, fixed intervals.

In Reference (2), ComEd agreed to make the following changes to the original license amendment request:

1. change all references of "Regulatory Guide 1.163, Revision 0" to "Regulatory Guide 1.163, September 1995,"
2. add a reference to "10CFR50, Appendix J, Option B" with every reference to "Regulatory Guide 1.163, September 1995, and
3. restore the acceptance criteria to Technical Specification Surveillance Requirements (TSSRs) 4.6.1.3.a and 4.6.1.3.d.

In Reference (3), ComEd agreed to make the following changes to the supplement license amendment request:

1. revise Technical Specification Surveillance Requirement 4.6.1.2.a. and associated footnote to indicate exception taken to Nuclear Energy Institute (NEI) document NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10CFR50, Appendix J",
2. revise Technical Specification Surveillance Requirement 4.6.1.3.a. to clarify that containment air lock testing is completed in accordance with Regulatory 1.163, September 1995, Appendix J, Option B.

The proposed changes in this document are to supersede the corresponding pages in the supplemental license amendment request (Reference 3). There are no changes to the original Attachment C, Evaluation of Significant Hazards Considerations.

March 28, 1996

The proposed changes in this supplemental license amendment request have been reviewed and approved by both On-site and Off-site Review in accordance with ComEd procedures.

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

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


Sincerely,



Marcia T. Lesniak
Nuclear Licensing Administrator



Signed before me on
this 28th day of March, 1996.


Notary Public

Attachment A: Discussion of Additional Proposed Changes
for 10CFR50, Appendix J, Option B

Attachment B: Proposed changes to Appendix A, Technical Specifications
for the Byron Nuclear Power Station, Units 1 and 2

Attachment B2: Proposed changes to Appendix A, Technical Specifications
for the Braidwood Nuclear Power Station, Units 1 and 2

cc: H.J. Miller, Regional Administrator - RIII
G.F. Dick, Jr., Byron Project Manager - NRR
R.R. Assa, Braidwood Project Manager - NRR
J.B. Hickman, Project Manager, PDIII-1-NRR
H. Peterson, Senior Resident Inspector - Byron
C.J. Phillips, Senior Resident Inspector - Braidwood
Office of Nuclear Facility Safety - IDNS

ATTACHMENT A

ATTACHMENT

DISCUSSION OF ADDITIONAL PROPOSED CHANGES FOR 10 CFR 50, APPENDIX J, OPTION B

Commonwealth Edison (ComEd) is proposing two changes to the proposed Technical Specification changes to reflect 10 CFR 50, Appendix J, Option B. The changes apply to the supplement transmitted on February 27, 1996. These changes were discussed in a conference call with the NRC on March 27, 1996.

Technical Specification Surveillance Requirement 4.6.1.2

Technical Specification surveillance requirement 4.6.1.2 is revised to reflect an exception to the elapsed time between the first and last tests in a series of consecutive satisfactory Type A leakage tests used to determine performance. 10 CFR 50, Appendix J, Option B, (Option B) allows utilities to base the frequency of Type A tests on the historical performance of the containment system. Regulatory Guide 1.163, September 1995, provides guidance on an acceptable performance-based leak-test program to comply with Option B. The Regulatory Guide endorses NEI 94-01, "Industry Guideline for Implementing Performance-based Option of 10 CFR Part 50, Appendix J," Revision 0.

ComEd is proposing to take exception to the minimum 24 month interval between Type A tests specified in Section 9.2.3 of NEI 94-01 and use a nominal 18 month interval instead, to correspond to the normal Byron and Braidwood refueling interval. This position is consistent with the statements in Sections 10.2.1.2 and 10.2.3.2 of NEI 94-01, which state that the minimum elapsed time between Type B or C tests shall be 24 months or the nominal test interval (e.g., refueling cycle). Furthermore, 10 CFR 50, Appendix J, Option A, Section III.A.6(b) requires Type A testing at each plant shutdown for refueling. For Byron and Braidwood, this would mean a test interval of approximately 18 months. Requiring the minimum elapsed time between Type A tests to be 24 months places an additional burden on plants with a refueling interval of less than 24 months because at least one extra test would need to be performed before Option B may be used. The 24 month interval in NEI 94-01 for Option B is inconsistent with the requirements of Option A.

In Attachment A of the most recent submittal, ComEd noted that the only currently approved exemption to 10 CFR 50, Appendix J, is no longer needed. No further exemptions were discussed. The change described above would become the single exception to NEI 94-01, which is used in part to implement 10 CFR 50, Appendix J.

Technical Specification Surveillance Requirement 4.6.1.3.a

Technical Specification surveillance requirement 4.6.1.3.a is revised to clarify that containment air lock testing is completed in accordance with Regulatory Guide 1.163, September 1995, and 10 CFR 50, Appendix J, Option B.

The original proposed verbiage retained "after each closing" from current Technical Specification requirements. The intent was to review the requirements in the referenced documents to determine whether or not the testing was required, and, if so, the time interval to complete the testing. However, based upon the March 27, 1996, teleconference it was determined the proposed verbiage was ambiguous and could have resulted in additional testing compared with the current requirements. ComEd elects to remove "after each closing" so that the intent of the original proposed change is retained.

There are no changes to Attachment A, Description and Safety Analysis of the Proposed Changes, from the February 27 transmittal. ComEd included a paragraph describing our intent to take exception to the 24 month interval for Type A testing on page 4 of Attachment A. The proposed change to the containment air lock testing was not quoted directly in Attachment A, and no further changes are necessary. There are no changes to the Evaluation of Significant Hazards Consideration. These changes require two new pages for Attachment B, which has the marked up Technical Specification pages. The new pages are page 3/4 6-2 and the page with inserts for page 3/4 6-5.

ATTACHMENT B