



Commonwealth Edison
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February 12, 1985

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

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

REFERENCES: (a) October 23, 1984 letter from C. Reed to H.R. Denton
(b) May 2, 1984 letter from L.O. DelGeorge to H.R. Denton

Dear Mr. Denton,

This letter provides Commonwealth Edison's confirmation that the Technical Specifications to be issued February 13, 1985 accurately reflect the current as-built units as well as the FSAR as amended. The 100% power Technical Specifications result from changes made to the Technical Specifications (NUREG-1097) provided as Appendix A to the Facility Operating License NPF-23. These changes fall into four categories and are as follows:

1. Changes to correct overly conservative Technical Specifications as identified through experience gained in the performance of plant surveillances and startup testing.
2. Changes required to develop a combined Unit 1 and 2 Technical Specification.
3. Changes based on recent recommendations from Westinghouse and Sargent and Lundy.
4. Changes requested by the NRC.

The Technical Specification certification process performed by Commonwealth Edison for the original Tech Specs has been documented in the October 23, 1984 letter from C. Reed to H.R. Denton. This letter described the corporate and station departments involved in the certification. They were: Project Engineering, Technical Services - Nuclear, Station Electrical Engineering, Nuclear Fuel Services, Nuclear Licensing, Westinghouse and Sargent and Lundy personnel where applicable, Byron Technical Staff, Byron Training, Byron Operating, Byron Maintenance, Byron Radiation Chemistry and Nuclear Safety. Personnel involved in this review included SRO's licensed previously at other stations, and Shift Control Room

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Engineers (Shift Technical Advisors) and SRO's currently licensed at Byron.

The technical changes described above have been reviewed by members of the Byron Station Technical Staff, Station On-Site Review and Off-Site Review as required by Technical Specifications 6.5.2.b.3 & 6.5.1.a.4. In addition, these changes have also been discussed with the NRC Staff and agreed upon.

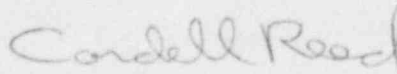
There are certain Technical Specification requirements, such as surveillance times, which are patterned after the Westinghouse Standardized Technical Specifications and are not directly linked to specific FSAR analyses. To the extent that we can demonstrate such requirements to be unnecessarily conservative, we intend to propose Technical Specification changes in the future. One set of such changes was already proposed in reference (b).

All of the safety limits, LCO's and setpoints specified in the Technical Specifications are based upon conservative analyses. To the extent that those analyses are unnecessarily conservative, we may be proposing specific changes to redefine those limits. Changes to correct overly conservative Technical Specifications may also be proposed as experience is gained through the performance of those surveillances and as the Technical Specifications are implemented during the startup program.

To the best of my knowledge and belief, the statements contained herein are true and correct. In some respects, these statements are not based on my personal knowledge but upon information received from other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

If there are any further questions regarding this matter, please contact this office.

Very truly yours,



Cordell Reed
Vice President

CR/sk