



Commonwealth Edison

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DMB

September 16, 1985

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Initial Test Program
NRC Docket Nos. 50-454, 50-455,
50-456 and 50-457

Reference (a): August 1, 1985 letter from L. O.
DelGeorge to J. G. Keppler

Dear Mr. Keppler:

This is to inform you of a change to the Initial Test Program described in Chapter 14 of the FSAR in accordance with Byron Unit 1 Operating License NPF-37 Condition 2.C.(3). The change was made effective on August 20, 1985 and was initiated as corrective action for violation 1a described in reference (a).

Attached is FSAR Table 14.2-78, "Control Rod Reactivity Worth Measurement," which has been revised to more clearly indicate the testing limitations associated with validating rod worths in the Westinghouse Nuclear Design Report.

We have determined that this change does not involve an unreviewed safety question because it is only an editorial change that does not affect the initial commitment in the FSAR with regard to physics testing. The bases for all Technical Specifications remain the same and the margin of safety is not affected.

One signed original and thirty-nine (39) copies of this letter and attachment are provided for your use. Please direct any questions regarding this matter to this office.

Very truly yours,

K. A. Ainger

K. A. Ainger
Nuclear Licensing Administrator

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Attachment

cc: Director of Inspection and Enforcement
Byron Resident Inspector

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TABLE 14.2-78
CONTROL ROD REACTIVITY WORTH MEASUREMENT
(Startup Test)

Plant Condition or Prerequisite

Reactor is critical with the neutron flux level in the zero power physics testing range. RCS temperature and pressure are at hot no-load values.

Test Objective

To determine ~~the~~ selected differential individual, and bank integral rod worth and to verify rod worth for shutdown capability.

rod worths by
measurements,

Test Summary

Under zero power conditions at approximately operating temperature and pressure, the nuclear design predictions for Rod Cluster Control Assembly (RCCA) Banks' differential worth will be validated. The validation will be made from boron concentration sampling data, RCCA bank positions and recorder traces of reactivity. From this data the integral RCCA bank worths will be determined. The minimum boron concentration for maintaining the reactor shutdown with the most reactive RCCA stuck in the full out position will be determined. The determination will be made from analysis of boron concentration and RCCA worths.

Acceptance Criteria

The control rod reactivity worths are ~~within values used~~ in agreement with those given in the Westinghouse supplied ~~Byron Station~~ Nuclear Design Report where such worths can be safely and practicably demonstrated by testing. Overall shutdown margin for the plant will be verified if individual shutdown bank worths cannot be fully established by testing, to conform to the Nuclear Design Report.