



Sinnissippi Alliance for the Environment

326 North Avon Street Rockford, Illinois 61103

U.S. N.R.C.
Attn: B.J. Youngblood
Washington, D.C. 20555

August 14, 1985

On August 9 we received notice of the enclosed amendment request for the Byron Nuclear Power Plant.

We went to the Local Public Document Room (LPDR) and found outdated technical specifications. We are in no position to determine whether or not the request by Commonwealth Edison is appropriate.

If the public is to be afforded the chance to respond to such requests, we should have access to updated information.

We could intervene in the amendment request, ask for a hearing, and receive the information during discovery, but that could prove to be a waste of your time and ours.

We therefore request that you update the technical specifications in our local PDR, and review the material to insure that it is complete.

Please respond as to when this will be done.

Yours,

Stanley E. Campbell
Secretary

cc: Rep. Lynn Martin

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involve a significant reduction in a margin of safety. Therefore, the staff proposes that the amendments do not involve a significant hazards consideration.

Local Public Document Room location: Southport, Brunswick County, Library, 109 W. Moore Street, Southport, North Carolina 28461.

Attorney for licensee: George F. Trowbridge, Esquire, Shaw, Pittman, Potts and Trowbridge, 1800 M Street, NW., Washington, DC 20036.

NRC Branch Chief: Domenic B. Vassallo.

Carolina Power & Light Company,
Docket Nos. 50-325 and 50-324,
Brunswick Steam Electric Plant, Units 1 and 2, Brunswick County, North Carolina

Date of application for amendment: July 1, 1985.

Description of amendment request: The proposed amendment would revise the Technical Specifications (TS) to change the surveillance requirements for the Reactor Protection System Instrumentation and the Control Rod Withdrawal Block Instrumentation as given in Table 4.3.1-1 and 4.3.4-1 of the Brunswick-1 and Brunswick-2 TS.

At specified intervals and/or prior to each reactor startup, the monitors associated with the Control Rod Withdrawal Block and the Reactor Protection System are required to have channel functional tests performed. However, when the Reactor Mode Switch (RMS) is in the shutdown position, existing circuitry in the RMS prohibits testing of some of these instruments. In order to perform the channel functional test on these instruments without excessive circuit jumping, this TS change would allow the RMS to be temporarily placed in a position other than that corresponding to the actual plant Operational Condition (OC). It should be noted that no change in the actual plant operation condition, will occur, only a change in the position of the RMS. Instruments affected by these proposed changes are identified as items 2.a and 2.b of TS Table 4.3.1-1 and Items 1.b, 1.d, and 4.a of TS Table 4.3.4-1.

A similar conditions exists for other instruments associated with the Control Rod Block and Reactor Protection System when the plant is in OC 1 (Run). Section 4.0.4 of the TS prohibits entry into an operational condition unless all Surveillance Requirements associated with the Limiting Conditions for Operation (LCO) applicable to the OC to be entered have been performed within the applicable surveillance interval or as otherwise specified. Therefore, in order

to enter OC 2 (Startup/Hot Standby) from OC 1, the surveillance tests required for OC 2 must be performed. However, the channel functional test circuitry of some instrumentation is bypassed when the RMS is in the RUN position, thereby prohibiting performance of the channel functional test. The proposed TS change would allow for performance of the required surveillance test to be completed within 12 hours of entering OC 2 from OC 1 for the affected instruments. Instruments affected by this change are identified as Items 1.a and 1.b of TS Table 4.3.1-1 and Items 1.d, 3.a, 3.c, and 3.d of TS Table 4.3.4-1.

In addition to the changes described above, a weekly channel functional test is added to the Neutron Flux-High trip function of the Intermediate Range Monitors (IRM) during OC 2 (Item 1.a, Table 4.3.1-1). This ensures that the trip function is periodically tested during extended unit operation in OC 2 (greater than 7 days). This surveillance requirement is currently in effect for the IRM inoperative trip function and is consistent with the Standard Technical Specification (NUREG-0123).

Basis for proposed no significant hazards consideration determination: We have reviewed this request and determined that the proposed amendment does not increase the probability or consequences of an accident previously evaluated as there is no physical alternation of the plant configuration or changes to setpoints or operating parameters. The operational condition of the plant is based on RMS position and average reactor coolant temperature. The RMS position controls only the logic circuitry of the plant; none of the other parameter dictating an OC will be varied when performing the required channel functional test.

Our review also verified that the proposed amendment does not create the possibility of a new kind of accident because the control rods will be fully inserted and remain so until all LCOs are met for the performance of required surveillance during Startup/Hot Standby, Shutdown or Refueling modes. Also, performing a channel functional test in the actual logic configuration in which the components will be required during the surveillance addressed by this request is preferable to the extensive use of jumpers currently employed to accomplish the channel functional test.

The addition of footnote (d) to Items 1.a and 1.b of Table 4.3.1-1 and to Items 1.d, 3.a, 3.b, 3.c, and 3.d of Table 4.3.4-1 allows for performance of the required surveillance within 12 hours of entering OC 2 from OC 1. This change is consistent with existing allowances for

the APRMs and IRMs in the respective tables and does not constitute a significant change in a margin of safety.

Based on our review of the amendment request and the above discussion, the Commission proposes to determine that operation of the facility in accordance with the proposed amendment would not: (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Therefore, this request involves no significant hazards consideration.

Local Public Document Room location: Southport, Brunswick County Library, 109 W. Moore Street, Southport, North Carolina 28461.

Attorney for licensee: George F. Trowbridge, Esquire, Shaw, Pittman, Potts and Trowbridge, 1800 M Street, NW., Washington, D.C. 20036.

NRC Branch Chief: Domenic B. Vassallo.

Commonwealth Edison Company,
Docket Nos. STN 50-454 and STN 50-455, Byron Station, Units 1 and 2, Ogle County, Illinois

Date of application for amendment: June 26, 1985.

Description of amendment request: The amendment would revise the Technical Specification Section 5.12.2. The proposed change would allow personnel to enter areas with radiation levels greater than 1000 mR/h during certain emergencies without an approved Radiation Work Permit (RWP). During emergency situations involving personnel injury or potential damage to major equipment, the proposed change would allow for continuous surveillance and radiation monitoring of the area by a qualified individual in lieu of an approved RWP.

Basis for Proposed No Significant Hazards Consideration Determination: Based on the three criteria in 10 CFR 50.92 for defining a significant hazards consideration, operation of Byron Station, Units 1 and 2, in accordance with the proposed amendment will not:

(1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The probability of an accident previously evaluated remains unchanged since the proposed change only involves an administrative control associated with radiation protection or workers. The consequences of an accident previously evaluated also remain unchanged since the offsite doses that have been

predicted for previously evaluated accidents will remain unchanged.

(2) Create the possibility of a new or different kind of accident from any accident previously evaluated because radiation protection for workers will still be in effect. The proposed change allows for an alternate means of providing radiation protection for workers during certain emergencies.

(3) Involve a significant reduction in a margin of safety because the administrative radiation exposure limits for workers are not affected by this change.

Therefore, the staff proposes to determine that the amendment does not involve a significant hazards consideration.

Local Public Document Room
location: Rockford Public Library, 215 N. Wyman Street, Rockford, Illinois 61103.

Attorney for licensee: Michael Miller, Isham, Lincoln & Beale, One First National Plaza, 42nd Floor, Chicago, Illinois 60603.

NRC Branch Chief: B.J. Youngblood.

Commonwealth Edison Company,
Docket Nos. 50-295 and 50-304, Zion Nuclear Power Station, Unit Nos. 1 and 2, Benton County, Illinois

Date of application for amendments:
June 28, 1985.

Description of amendments request:
These amendments would modify Sections 3.22, 4.22, and 6.5.B of the Technical Specifications. These changes are being submitted in order to convert these Sections to the Standardized Technical Specification's content. In all categories, with the exception of hydraulic snubber visual inspection and functional testing, the proposed Technical Specifications will impose additional restrictions that are not included in the present Technical Specifications.

While the proposed programs for hydraulic snubber visual inspections and functional testing have not been significantly altered, the acceptance criteria for these activities have been more closely defined. Thus, these constraints also constitute an additional control not included in the present Technical Specifications.

Basis for proposed no significant hazards consideration determination:
The Commission's examples of actions involving no significant hazards consideration (48 FR 14870) include: (ii) a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications; for example, a more stringent surveillance requirement.

The above changes to Sections 3.22, 4.22 and 6.5.B all involve additional

restrictions or controls that are not included in the present Technical Specifications, and fit example (ii).

The staff therefore proposes that these amendments do not involve significant hazards consideration.

Local Public Document Room
location: Zion-Benton Library District, 2600 Emmaus Avenue, Zion, Illinois 60099.

Attorney to licensee: P. Steptoe, Esq., Isham, Lincoln and Beale, Counselors at Law, Three First National Plaza, 51st Floor, Chicago, Illinois 60602.

NRC Branch Chief: Steven A. Varga.

Duquesne Light Company, Docket No. 50-334, Beaver Valley Power Station, Unit No. 1, Shippingport, Pennsylvania

Date of amendment request:
December 12, 1984, as supplemented June 27, 1985

Description of amendment request:
Regarding the request for amendment dated December 12, 1984, the Commission has issued a proposed no significant hazards determination on February 27, 1985 (50 FR 7986). The June 1985 request, however, expands the scope of the December 1984 request as follows:

The expanded scope of the proposed amendment would revise applicable specifications to allow the use of the Low Head Safety Injection (LHSI) pumps with an open Reactor Collant System (RCS) vent of 3.14 square inches in place of a charging pump when in Modes 5 and 6. Applicable surveillance requirements would be added to require demonstration of LHSI pump operability and verification of an open vent when used in place of the charging pump. The Mode 5 and 6 Action statement would also be revised to specify action to be taken when no charging pump or LHSI pump is operable. The Bases would be revised to provide justification for using a LHSI pump in place of a charging pump.

The use of the LHSI pumps in conjunction with an open RCS vent in lieu of a charging pump when in Modes 5 and 6 will allow the removal of the latter from service for inspection, modification or maintenance.

Basis for proposed no significant hazards consideration determination:
Modes 5 and 6 refer to cold shut down refueling, respectively. The requested amendment would permit use of either the charging pump or the LHSI pumps during these modes. Therefore, the plant would continue to have the capability to provide reactivity control and coolant makeup, via use of either type of pumps. On such basis, we conclude that the proposed amendment, as described in the June 27, 1985 submittal, would not

involve any significant increase in the probability or consequences of an accident previously evaluated, would not create the possibility of a new or different kind of accident previously analyzed, and would involve no reduction in the margin of safety. We, therefore, propose to characterize the proposed amendment as involving no significant hazards consideration.

Local Public Document Room
location: B.F. Jones Memorial Library, 663 Franklin Avenue, Aliquippa, Pennsylvania 15001.

Attorney for licensee: Gerald Charnoff, Esquire, Jay E. Silberg, Esquire, Shaw, Pittman, Potts, and Trowbridge, 1800 M Street, NW, Washington, D.C. 20036.

NRC Branch Chief: Steven A. Varga.

Nebraska Public Power District, Docket No. 50-298, Cooper Nuclear Station, Nemaha County, Nebraska

Date of amendment request: April 26, 1985, as supplemented May 5, and June 14, 1985.

Description of amendment request:
The proposed amendment would revise the Technical Specifications (TS) in the following areas: (1) Standby Gas Treatment System (SGTS) and Control Room Ventilation System flow and operability requirements; (2) Reactor Vessel Water Level trip settings; (3) clarification of Refueling Interlock requirements; (4) deletion of Equipment Qualification (EQ) program deadline date; and (5) correction of typographical errors and other editorial changes.

(1) *SGTS and Control Room Ventilation System.* The proposed changes to the SGTS and control room ventilation system TS would revise the limiting conditions for operation (LCO) for each system to specify the numerical values for design flow rate for filter bypass limits, flow velocity for filter effectiveness limits, and system fan capacities. At present, the numerical values for these parameters are not provided in the system LCOs. The proposed change would also add the numerical value of reactor building pressure that must be obtained from SGTS operation. The current SGTS LCO does not address this requirement. In addition to the above, wording changes are proposed to clarify the Bases section for both the SGTS and the control room ventilation systems.

(2) *Reaction Vessel Water Level Trip.* The proposed amendment would change the containment isolation trip setting for the reactor water sample valves from reactor low-low water level (greater than or equal to -37 in.) to reactor low-low-low water level (greater than