

Commonwealth Edison Company
Braidwood Generating Station
Route #1, Box 84
Braceville, IL 60407-9619
Tel 815-458-2801



March 24, 1997

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

Subject: Supplement to Operating Limits Report (OLR)
Proposed Technical Specifications Amendment

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

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

- Reference:
1. M. T. Lesniak (ComEd) to Document Control Desk (NRC)
Proposed Amendment to Facility Operating Licenses-
Reactivity Controls Systems letter, dated December 21, 1995
 2. H.G. Stanley (ComEd) to Document Control Desk (NRC)
Additional Information Regarding the Removal of Cycle-
Specific Parameter Limits from Technical Specifications
letter, dated October 24, 1996

In Reference 1 Commonwealth Edison Company (ComEd) proposed to amend Appendix A, Technical Specifications (TS) for Facility Operating Licenses NPF-37 and NPF-66 for Byron Nuclear Power Station Units 1 and 2, and Facility Operating Licenses NPF-72 and NPF-77 for Braidwood Nuclear Power Station Units 1 and 2. In the first referenced letter, ComEd proposed to change Technical Specifications to remove the values of the cycle-specific core operating limits from the Technical Specifications and to relocate these values to an Operating Limits Report (OLR). Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications" encouraged licensees to relocate cycle-specific parameters to this report. The proposed relocation was consistent with the guidance provided in Westinghouse Owners Groups letter, WOG 90-016, "Core Operating Limits Report License Amendment Submittal," dated January 19, 1990.

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This attached package supplements Reference 1 by providing the appropriate Technical Specifications Bases section changes. Included in the changes is the removal of references to Optimized Fuel Assembly (OFA) fuel. Current operating cycles no longer use OFA fuel.

This submittal also corrects an oversight in the original submittal by providing new marked up pages for TS Section 6.9.1.9, "Operating Limits Report." The original submittal did not provide the most current pages. The Insert B for these pages was provided in Reference 2, and it remains correct.

The proposed supplement does not affect the original No Significant Hazards Analysis. The proposed changes in this license amendment request have been reviewed and approved by both On-site and Off-site Review in accordance with ComEd procedures.

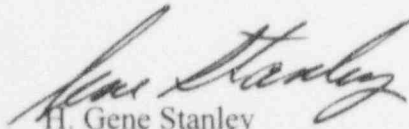
Replace the original Attachment A and the Attachment B pages with those attached in this submittal. Marked up pages B 2-1, B 2-2, B 3/4 2-4, and 6-22a are new pages to be added to the original submittal.

ComEd is notifying the State of Illinois of this supplement to the application for this license amendment request by transmitting a copy of this letter and its attachments to the designated State Official.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects 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 direct any questions to Marcia Lesniak, Nuclear Licensing Administrator, at (630) 663-6484.

Sincerely,

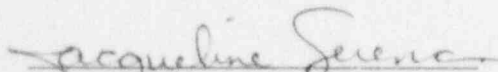
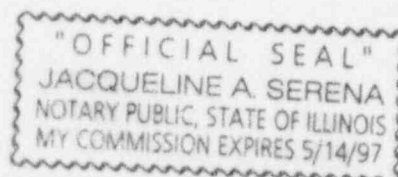


H. Gene Stanley

Site Vice President

Braidwood Generating Station

Signed before me on this 28th day of March, 1997 by


Notary Public

Attachment A: Description of the Proposed Changes
Attachment B: Proposed Changes to Appendix A, Technical Specifications and
Bases Sections

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cc: A. B. Beach, Regional Administrator - Region III
G. F. Dick, Project Manager - NRR
S. D. Burgess, Senior Resident Inspector - Byron
C. J. Phillips, Senior Resident Inspector - Braidwood
Office of Nuclear Facility Safety - IDNS

ATTACHMENT A

Proposed Changes to Appendix A, Technical Specifications for Facility Operating Licenses NPF-37 and NPF-66 for Byron Station Units 1 & 2, and NPF-72 and NPF-77 for Braidwood Station Units 1 & 2.

The NRC issued Generic Letter (GL) 88-16 "Removal of Cycle-Specific Parameter Limits from Technical Specifications" in October of 1988, to encourage licensees to amend their Technical Specifications related to cycle-specific parameters by implementing a Core Operating Limits Report (COLR) and relocating cycle-specific parameters to this report. The Byron and Braidwood cycle-specific parameters proposed for relocation are consistent with the guidance provided in Westinghouse Owners Group letter WOG 90-016, "Core Operating Limits Report License Amendment Submittal," dated January 19, 1990. A COLR was previously established at Byron and Braidwood as an Operating Limits Report (OLR) and currently contains a cycle-specific limit for the radial peaking factor, F_{xy} and Moderator Temperature Coefficient (MTC). ComEd proposes relocating the other cycle-specific core operating limits specified in the WOG letter 90-016 from the Technical Specifications to the OLR as identified in the attached amendment request.

1. Description of the Proposed Change

The proposed Technical Specification changes remove the values of the cycle-specific core operating limits from the Technical Specifications (TS) and references these values to an Operating Limits Report. The OLR will address these limits in accordance with the guidance provided in WOG letter 90-016, written in response to GL 88-16. Although the values of the affected parameters are being relocated to the OLR, the Limiting Condition for Operation (LCO) will continue to require compliance with these limits. Calculation of the core operating limits proposed for inclusion in the OLR will be performed in accordance with NRC approved methodologies referenced in TS 6.9.1.9, "Operating Limits Report." These methodologies are used for performing core reload designs and will be used when revisions to the OLR are required. Approval of the proposed amendment significantly reduces the probability that Commonwealth Edison Company (ComEd) will have to submit other TS changes related to core parameters in the future.

Several Technical Specifications contain limits associated with reactor physics parameters that generally change with each core reload, potentially requiring changes to the Technical Specifications. These limits ensure the assumptions used in the transient analyses in the Updated Final Safety Analysis Report (UFSAR) are satisfied.

The cycle-specific parameters and the changes proposed for relocation to the OLR as part of this license amendment request include:

- 1) Shutdown Rod Insertion Limit,
- 2) Control Rod Insertion Limits,
- 3) Axial Flux Difference Target Band,
- 4) Heat Flux Hot Channel Factor, $F_Q(Z)$, and
- 5) Nuclear Enthalpy Rise Hot Channel Factor.

Some additional changes to the index and the deletion of figures are proposed for consistency and completeness. The index is being revised to reflect that Figures 3.1-1, 3.2-1, and 3.2-2 are being relocated from the TS to the OLR. The definitions section is being

revised to add the acronym, OLR, for the Operating Limits Report. The shutdown rods will be limited in physical insertion as specified in the OLR, instead of being required to be fully withdrawn. The Action requirements for TS 3.1.3.1.b.2 and c.1 are being revised to delete the reference to Figure 3.1-1 and to reference Technical Specification 3.1.3.6 which contains the rod insertion limits as part of the OLR. TS 6.9.1.9 will be revised to provide a listing of the individual TS that address cycle-specific operating limits that will be relocated to the OLR. Also, TS 6.9.1.9 currently provides a listing of the analytical methods approved by the NRC and the administrative reporting requirements. The specification is being revised to provide a more complete list and identify the application of each method listed. Bases changes associated with the above discussed changes are also being made.

The proposed Operating Limits Reports for Byron 1 Cycle 7, Byron 2 Cycle 6, Braidwood 1 Cycle 5A, and Braidwood 2 Cycle 5 are provided in Attachments E, F, G and H, respectively. As required by TS 6.9.1.9, any mid-cycle revisions or supplements to the OLR shall be provided to the NRC upon issuance to allow continued trending of the cycle-specific parameters.

2. Description of Current Requirements

In Technical Specification 3.1.3.1, the Group Height specification for Movable Control Assemblies, the action requirements of b.2 and c.1 maintain the inoperable rods within the insertion limits specified in Figure 3.1.1, "Rod Bank Insertion Limits versus Thermal Power Four Loop Operation". This figure is to be relocated to the OLR.

The cycle-specific parameters currently located in the TS have the following requirements:

1) Shutdown Rod Insertion Limit (TS 3.1.3.5)

The LCO for the shutdown rod insertion limit requires that all shutdown rods shall be fully withdrawn. The action requires that with a maximum of one shutdown rod not fully withdrawn, within 1 hour fully withdraw the shutdown rod, or declare the rod to be inoperable and apply TS 3.1.3.1.

Technical Specification Surveillance Requirement (TSSR) 4.1.3.5 states that each shutdown rod shall be determined to be fully withdrawn within 15 minutes prior to withdrawal of any rods in Control Bank A, B, C, or D during an approach to reactor criticality, and at least once per 12 hours thereafter.

2) Control Rod Insertion Limits (TS 3.1.3.6)

The LCO for the control rod insertion limits requires the control banks to be limited in physical insertion as shown in Figure 3.1-1, "Rod Bank Insertion Limits versus Thermal Power Four Loop Operation." Action 3.1.3.6.b requires the unit to reduce thermal power within 2 hours to less than or equal to that fraction of rated thermal power which is allowed by the specified bank position using Figure 3.1-1. This figure is to be relocated to the OLR.

TSSR 4.1.3.6 states that the position of each control bank shall be determined to be within the insertion limits at least once per 12 hours except during time intervals when the rod insertion limit alarm is inoperable, then verify the individual rod positions at least once per 4 hours.

3) Axial Flux Difference (TS 3.2.1)

Technical Specification 3.2.1 requires that the axial flux difference (AFD) be maintained with the following target band about the target flux difference:

- a. $\pm 5\%$ for Cycle 1 core average accumulated burnup of less than or equal to 5000 MWD/MTU, and
- b. $+3\%$, -9% for Cycle 1 core average accumulated burnup of greater than 5000 MWD/MTU, and
- c. $+3\%$, -12% for each subsequent cycle.

The indicated AFD may deviate outside the required target band at greater than or equal to 50% but less than 90% of rated thermal power provided the indicated AFD is within the Acceptable Operation Limits of Figure 3.2-1 and the cumulative penalty deviation time does not exceed 1 hour during the previous 24 hours. This figure is to be relocated to the OLR.

The indicated AFD may deviate outside the required target band at greater than 15% but less than 50% of rated thermal power provided the cumulative penalty deviation time does not exceed 1 hour during the previous 24 hours.

The associated action requirements for AFD refer to the above required target band with relationship to Thermal Power and the Acceptable Operation Limits of Figure 3.2-1.

The TSSRs provide the requirements for determining the accumulated penalty time for the indicated AFD deviation when outside of the above required target band.

4) Heat Flux Hot Channel Factor - $F_Q(Z)$ (TS 3.2.2)

Technical Specification 3.2.2 provides the relationships for the heat flux hot channel factor, $F_Q(Z)$, as a function of the ratio of thermal power to rated thermal power (P) and $K(Z)$. The function $K(Z)$ is obtained from Figure 3.2-2 for a given core height location. This figure is to be relocated to the OLR. Different relationships are provided for P greater than 0.5 and P less than or equal to 0.5.

To determine whether $F_Q(Z)$ is within its limit, the radial peaking factor, F_{xy} , is evaluated. The TSSRs provide the requirements for evaluating F_{xy} .

5) Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}^N$ (TS 3.2.3)

Technical Specification 3.2.3 requires that the indicated Reactor Coolant System (RCS) total flow rate and the nuclear enthalpy rise hot channel factor, $F_{\Delta H}^N$, be maintained within specified limits. Relationships for $F_{\Delta H}^N$ are provided as a function of the ratio of thermal power to rated thermal power. Different $F_{\Delta H}^N$ relationships are provided for the different fuel types; Optimized Fuel Assembly (OFA) and VANTAGE 5. Action statement 3.2.3.a requires that with the RCS total flow rate or $F_{\Delta H}^N$ outside the region of acceptable operation within 2 hours either restore the RCS total flow rate and $F_{\Delta H}^N$ to within acceptable limits or reduce thermal power to less than 50% of rated thermal power and reduce the Power Range Neutron Flux-High Trip Setpoint to less than or equal to 55% of rated thermal power within the next 4 hours. Action Statement 3.2.3.b requires within 24 hours of initially being outside the limits, verification through incore flux mapping and RCS total flow rate comparison that the combination of $F_{\Delta H}^N$ and RCS total flow rate are restored to within limits, otherwise thermal power must be reduced to less than 5% of rated thermal power within the next 2 hours. Action Statement 3.2.3.c

requires that the cause and out-of-limit condition be identified and corrected prior to increasing thermal power.

The TSSRs provide the requirements for determining whether the RCS total flow rate and $F_{\Delta H}^N$ are within the region of acceptable operation.

6) Technical Specification 6.9.1.9, Operating Limits Report

Technical Specification 6.9.1.9 states that operating limits shall be established before each reload cycle or any remaining part of a reload.

7) Bases Section 2.1.1, Reactor Core

Section 2.1.1 is the bases section for reactor core safety. Specific design Departure from Nucleate Boiling Ratio (DNBR) and $F_{\Delta H}^N$ values are provided for Optimized Fuel Assembly (OFA) fuel and VANTAGE 5 fuel.

8) Bases Section 3/4.2.2 and 3/4.2.3, "Heat Flux Hot Channel Factor, and RCS Flowrate and Nuclear Enthalpy Rise Hot Channel Factor

Sections 3/4.2.2 and 3/4.2.3 are the bases sections for Heat Flux Hot Channel Factor - $F_Q(Z)$ and Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}^N$ specifications, which are discussed in the paragraphs above. Specific design DNBR and $F_{\Delta H}^N$ values are provided for OFA fuel and VANTAGE 5 fuel. The section also provides the specific transition core DNBR penalty maximum.

3. Bases for the Current requirements

The Reactivity Control systems specifications for Movable Control Assemblies, Group Height, assumes the shutdown rods to be fully withdrawn and the insertion limits for the control banks to be specified in the figure identifying the insertion limits vs thermal power for the control banks only.

- 1) Shutdown Rod Insertion Limit
and
- 2) Control Rod Insertion Limits

These specifications ensure that:

- a. acceptable power distribution limits are maintained,
- b. the minimum shutdown margin is maintained, and
- c. the potential effects of rod misalignment on associated accident analyses are limited.

3) Axial Flux Difference

The limits on AFD assure that the $F_Q(Z)$ upper bound envelope of the F_Q limit times the normalized axial peaking factor is not exceeded during either normal operation or in the event of xenon redistribution following power changes.

Target flux difference is determined at equilibrium xenon conditions. The full-length rods may be positioned within the core in accordance with their respective insertion limits and should be inserted near their normal position for steady-state operation at high power levels. The value of the target flux difference obtained under these conditions divided by the fraction of rated thermal power is the target flux difference at

rated thermal power for the associated burnup conditions. Target flux differences for other thermal power levels are obtained by multiplying the rated thermal power value by the appropriate fractional thermal power level. Periodic updating of the target flux difference value is necessary to reflect core burnup considerations.

During rapid plant thermal power reductions, control rod motion causes the AFD to deviate outside the target band at reduced thermal power levels. This deviation does not affect the xenon distribution sufficiently to change the envelope of peaking factors which may be reached on a subsequent return to rated thermal power provided the time duration is limited. Accordingly, limited cumulative penalty deviation time is allowed.

- 4) Heat Flux Hot Channel Factor - $F_Q(Z)$
and
- 5) Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}^N$

The limits on heat flux hot channel factor, RCS flowrate, and nuclear enthalpy rise hot channel factor ensure that:

- 1) the design limits on peak local power density and minimum Departure from Nucleate Boiling Ratio (DNBR) are not exceeded, and
- 2) in the event of a LOCA the peak clad temperature will not exceed the 2200°F Emergency Core Cooling System (ECCS) acceptance criteria limit.

Each of these factors are measurable but will only be determined periodically as specified in Specifications 4.2.2 and 4.2.3. These periodic surveillances are sufficient to ensure that the limits are maintained provided:

- a. Control rods in a single group move together with no individual rod position differing by more than ± 12 steps, indicated, from the group demand position,
- b. Control rod groups are sequenced with overlapping groups as described in TS 3.1.3.6,
- c. The control rod insertion limits of TS 3.1.3.6 are maintained, and
- d. The axial power distribution, expressed in terms of AFD, is maintained within the limits.

$F_{\Delta H}^N$ will be maintained within its limits provided the conditions a. through d. above are maintained. The combination of RCS flow and the requirement of $F_{\Delta H}^N$ guarantee that the DNBR used in safety analysis will be met.

The radial peaking factor, $F_{xy}(Z)$, is measured periodically to provide assurance that the hot channel $F_Q(Z)$ remains within its limit. The F_{xy} limit for rated thermal power (F_{xy}^{RTP}) is determined from expected power control maneuvers over the full range of burnup conditions in the core.

- 6) Technical Specification 6.9.1.9, Operating Limits Report

Section 6.0 provides administrative controls.

- 7) Bases Section 2.1.1, Reactor Core

This section describes the bases for reactor core safety limits.

- 8) Bases Section 3/4.2.2 and 3/4.2.3, "Heat Flux Hot Channel Factor, and RCS Flowrate and Nuclear Enthalpy Rise Hot Channel Factor

This section describes the bases for the limits on Heat Flux Hot Channel Factor - $F_Q(Z)$ and Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}^N$

4. Description of the Need for Amending the Technical Specifications

ComEd proposes relocating cycle-specific core operating limits from the Technical Specifications to the Operating Limits Report. The OLR will facilitate modification of certain Technical Specification core operating parameter limits via the 10 CFR 50.59 process, provided NRC approved methodologies for the calculations are used. The ability to redefine core operating limits without a formal change to the TS will provide increased flexibility for optimization of reload core designs, and will reduce the engineering and regulatory burden associated with implementation of plant operating parameter changes. The implementation of this amendment request will result in a resource savings for the licensees and the NRC by eliminating the need for additional license amendment requests for these relocated core operating limits.

5. Description of the Proposed Amendment

The specification for Movable Control Assemblies group height, TS 3.1.3.1.b.2 and c.1 will be revised to maintain the inoperable rods within the insertion limits of TS 3.1.3.6 instead of the insertion limits of Figure 3.1.1.

The cycle-specific parameters limits proposed for relocation to the OLR include:

1) Shutdown Rod Insertion Limit (TS 3.1.3.5)

The LCO for the Shutdown Rod Insertion Limit will be revised to refer to the insertion limit specified in the Operating Limits Report instead of verifying the shutdown rods are fully withdrawn.

The LCO will state:

"All shutdown rods shall be limited in physical insertion as specified in the Operating Limits Report."

The action statement will reflect the LCO to state:

"With a maximum of one shutdown rod inserted beyond the insertion limit, ... within 1 hour either:

- a. Restore the rod to within the insertion limit specified in the Operating Limits Report, or
- b. Declare the rod to be inoperable and apply TS 3.1.3.1."

TSSR 4.1.3.5 will be revised to require that each shutdown rod be determined to be within the insertion limit.

2) Control Rod Insertion Limits (TS 3.1.3.6)

A similar change is proposed to the LCO and action statement b. for TS 3.1.3.6. The change to the LCO will remove references to Figure 3.1-1 and limit the physical insertion of the control rods to the insertion limits specified in the Operating Limits Report.

The action statement will be revised to be consistent with the LCO and will delete the word above in reference to insertion limits. The action statement b. will be revised to use the insertion limits specified in the Operating Limits Report instead of referencing the above figure.

Figure 3.1-1, "Rod Bank Insertion Limits versus Thermal Power - Four Loop Operation" will be deleted from Technical Specification and placed in the Operating Limits Report.

3) Axial Flux Difference (TS 3.2.1)

ComEd proposes deleting the AFD target bands specified in the LCO of TS 3.2.1 and instead refer to the target band specified in the Operating Limits Report. Reference to Figure 3.2-1, "Axial Flux Difference Limits as a Function of Rated Thermal Power", will be eliminated. Figure 3.2-1 will be deleted from Technical Specification and placed in the Operating Limits Report with any reference to the figure directed to the OLR. The specified target bands will be deleted from TS 3.2.1 and the limits will be relocated to the OLR.

Throughout this specification, the reference to the "above" required target band will be revised.

The associated bases section will be revised to eliminate reference to Figure 3.2-1 and instead refer to the limits specified in the Operating Limits Report.

4) Heat Flux Hot Channel Factor - $F_Q(Z)$ (TS 3.2.2)

ComEd proposes replacing the relationships for $F_Q(Z)$ in TS 3.2.2, Heat Flux Hot Channel Factor, by relocating the specific numerical limits with F_Q^{RTP} or a function of F_Q^{RTP} with the following relationships:

$$F_Q(Z) \leq [F_Q^{RTP}/P][K(Z)] \text{ for } P > 0.5$$

$$F_Q(Z) \leq [F_Q^{RTP}/0.5][K(Z)] \text{ for } P \leq 0.5$$

where: $P = \frac{\text{THERMAL POWER}}{\text{RATED THERMAL POWER}}$,

$F_Q^{RTP} =$ the F_Q limit(s) at RATED THERMAL POWER (RTP) specified in the OPERATING LIMITS REPORT, and

$K(Z) =$ the function specified in the OPERATING LIMITS REPORT for a given core height location.

Consequently, Figure 3.2-2, "K(Z) - NORMALIZED $F_Q(Z)$ AS A FUNCTION OF CORE HEIGHT," will be removed from the Technical Specification and placed in the Operating Limits Report.

The cycle specific parameters for $F_Q(Z)$ at Byron and Braidwood will be removed as an editorial change to the specification.

5) Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}^N$ (TS 3.2.3)

ComEd proposes replacing the relationships for Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}^N$) in TS 3.2.3, RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor, with values specified in the Operating Limits Report. The numerical limits stated in Technical Specification 3.2.3 will be replaced with $F_{\Delta H}^{RTP}$, a specified value for the Nuclear Enthalpy Rise Hot Channel Factor as a relationship with the rated thermal power, which will be located in the OLR.

A Power Factor Multiplier for $F_{\Delta H}^N$, $PF_{\Delta H}$, will be added to this specification and the value located in the OLR. Also, an editorial change will be made to this specification, removing the differing limits for $F_{\Delta H}^N$ for Optimized Fuel and VANTAGE 5 Fuel and making the equation for calculation of these limits similar.

The LCO for 3.2.3.b will be revised to read as follows:

$$F_{\Delta H}^N \leq F_{\Delta H}^{RTP} [1.0 + PF_{\Delta H}(1.0 - P)]$$

where: $P = \frac{\text{THERMAL POWER}}{\text{RATED THERMAL POWER}},$

$F_{\Delta H}^{RTP} =$ the $F_{\Delta H}^N$ limit(s) at RATED THERMAL POWER (RTP) specified in the OPERATING LIMITS REPORT, and

$PF_{\Delta H} =$ the Power Factor Multiplier(s) for $F_{\Delta H}^N$ specified in the OPERATING LIMITS REPORT.

6) Technical Specification 6.9.1.9, Operating Limits Report

The proposed change to TS 6.9.1.9 includes a more detailed list of the NRC approved methodologies used for Byron and Braidwood. These changes are made in accordance with the requirements set forth in the NRC GL 88-16. The analytical methods listed will be the latest approved version of the documents used to determine the operating limits. Technical Specification 6.9.1.9 will also be expanded to identify the additional parameters relocated to the Operating Limits Report.

7) Bases 2.1.1, Reactor Core

The fifth paragraph of Bases Section 2.1.1, "Reactor Core" on page B 2-1 will be replaced with the following proposed new wording, "Margin is maintained by meeting safety analysis DNBR limits." The footnote and asterisk(s) associated with the words "Optimized Fuel Assemblies" will be deleted in the fifth paragraph.

The seventh paragraph of Bases Section 2.1.1 on page B 2-2 will be modified to read, "These curves are based on the value of the limiting enthalpy hot channel factor, $F_{\Delta H}^N$, with an allowance included to increase $F_{\Delta H}^N$ at reduced power." The first word in the last paragraph in this Bases Section will be changed from "These" to "The."

8) Bases Section 3/4.2.2 and 3/4.2.3, "Heat Flux Hot Channel Factor, and RCS Flowrate and Nuclear Enthalpy Rise Hot Channel Factor

The specific values in the fourth paragraph of Bases Section 3/4.2.2 and 3/4.2.3, "Heat Flux Hot Channel Factor, and RCS Flowrate and Nuclear Enthalpy Rise Hot Channel Factor", on page B 3/4 2-4 will be deleted. This paragraph will read, "Margin between the safety analysis limit DNBR and the design limit DNBR is maintained."

The words, "the transition core DNBR penalty (maximum of 12.5%) and," in the first sentence of the fifth paragraph of Bases Section 3/4.2.2 and 3/4.2.3. will be deleted.

In the sixth paragraph of Bases Section 3/4.2.2 and 3/4.2.3 the words, "Improved Thermal Design Procedure" and the associated parentheses will be deleted.

6. Bases of the Proposed Amendment

GL 88-16 and the WOG letter 90-016 provides guidance for removal of cycle-specific parameter limits from Technical Specifications and requires three separate actions to modify the plant's TS:

1. the addition of a new defined term for a formal report that includes the values of cycle-specific parameter limits that have been established using NRC approved methodology consistent with applicable limits of the safety analysis,
2. the addition of its associated reporting requirement to the Administrative section of the TS to submit the formal report on cycle-specific parameter limits to the Commission for information, and
3. the modification of individual Technical Specification to note that cycle-specific parameters shall be maintained within the limits provided in the defined formal report.

The Operating Limits Report is currently defined in the Technical Specifications as the unit specific document that provides operating limits for the current operating reload cycle. These cycle-specific operating limits shall be determined for each reload cycle in accordance with TS 6.9.1.9.

Technical Specification 6.9.1.9 currently provides the administrative reporting requirements. This specification states that the Operating Limits Report, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector. Plant Operation within these operating limits is addressed in individual specifications. Technical Specification 6.9.1.9 will be revised to provide a listing of the individual TS that address cycle-specific operating limits to be relocated to the OLR. Technical Specification 6.9.1.9 currently provides a listing of the analytical methods approved by the NRC and the administrative reporting requirements. The proposed modifications of the individual TS to note that cycle-specific parameters shall be maintained within the limits provided in the OLR are provided in Attachment B.

The cycle-specific parameters proposed for relocation to the OLR and the proposed TS markups are consistent with the guidance provided in Westinghouse Owners Group letter WOG-90-016, "Core Operating Limits Report License Amendment Submittal," dated January 19, 1990. The proposed changes are also consistent with NUREG-1431, "Standard Technical Specifications for Westinghouse Plants."

The specific values contained in the current Bases Sections 2.1.1 and 3/4.2.2 and 3/4.2.3 may be changed under the provisions of 10CFR50.59 using NRC approved methodologies. This process is administratively controlled through the reload procedures. Therefore, the specific values may be removed from the Bases. Reference to OFA fuel, the transition core DNBR penalty, and the Improved Thermal Design Procedure may be removed from the Bases since current operating cycles do not use OFA fuel.

7. Impact of the Proposed Change

The proposed Technical Specification changes are being submitted in accordance with the guidance provided in Generic Letter 88-16 and the WOG letter 90-016. Changes are proposed to the individual Technical Specifications that contain the cycle-specific core operating limits. These proposed changes delete the cycle-specific core operating limits and reference the Operating Limits Report. Thus, the need to submit a Technical Specification change for revised cycle-specific core operating limits will be reduced. The proposed changes to the Administrative Controls section ensure that calculation of the core operating limits proposed for inclusion in the Operating Limits Report will be performed in accordance with NRC approved methodologies.

The proposed changes are considered administrative in nature. The cycle-specific core operating limits will continue to be maintained in the operation of the plant. The proposed amendment does not change any required action as a result of not meeting a Technical Specification requirement nor does the proposed amendment change any surveillance requirement. Thus, there is no impact on plant operation. The cycle specific limits within the OLR will be implemented and controlled procedurally. The proposed changes have no impact on the current safety analysis. However, each accident analysis addressed in the Updated Final Safety Analysis Report (UFSAR) will be reviewed as a result of changes in any cycle dependent parameter during the reload design process.

8. Schedule Requirements

ComEd requests approval of the proposed amendment prior to loading the Braidwood Unit 1 Cycle 7 core, scheduled for the end of April, 1997.