



Commonwealth Edison

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February 7, 1986

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

Subject: Byron Station Units 1 and 2
Limiting Conditions for Operation
Relaxation Program
NRC Docket Nos. 50-454 and 50-455

Reference (a): May 2, 1984 letter from L. O. DelGeorge
to H. R. Denton

Dear Mr. Denton:

Reference (a) transmitted a report titled "Byron Generating Station Limiting Conditions for Operation Relaxation Program". This report documents a study which evaluated the effect on plant risk from increasing allowable out-of-service times for certain equipment. One of the systems studied in this report is the Essential Service Water (ESW) system.

During the review of this report, it was determined that the success criteria related to loss of an ESW system train was modeled more conservatively than necessary. Specifically, it was modeled such that success was dependent on the operation of ESW cooling tower fans.

For a non-LOCA condition, no cooling tower fans are required to accomplish a safe shutdown of the plant. This is supported by analysis discussed in the response to FSAR question 10.39. In consideration of this, there is no cooling tower fan contribution to the loss of ESW initiating event.

Please direct any questions regarding this matter to this office.

One signed original and fifteen copies of this letter are provided.

Very truly yours,

K. A. Ainger
Nuclear Licensing Administrator

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cc: Byron Resident Inspector

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