

ATTACHMENT B

PROPOSED CHANGES TO THE BYRON/BRAIDWOOD UFSAR

REVISED PAGES

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BYRON-UFSAR

TABLE 15.0-11 (Cont'd)

POSTULATED ACCIDENT	UFSAR SECTION	DOSE (2 HOURS) AT EXCLUSION AREA BOUNDARY (445 meters)		DOSE (COURSE OF ACCIDENT) AT LOW POPULATION ZONE (4828 meters)	
		THYROID (REM)	WHOLE BODY (REM)	THYROID (REM)	WHOLE BODY (REM)
Process Gas System Rupture	15.7.1				
Conservative		0	1.02 (+0)	0	3.05 (-2)
Realistic		0	6.52 (-3)	0	1.58 (-4)
			3		1
Radioactive Liquid Waste System Failure	15.7.3				
Spent Resin Tank		2.83 (-1)	8.30 (-5)	8.40 (-3)	2.50 (-6)
Recycle Holdup Tank		9.90 (-3)	2.50 (-1)	3.00 (-4)	7.60 (-3)
Fuel Handling Accident in Con- tainment	15.7.4				
Conservative					
Realistic					
In Fuel Building					
Conservative		2.44 (+1)	7.30 (-1)	7.30 (-1)	2.18 (-2)
Realistic		1.37 (-3)	1.62 (-4)	3.16 (-5)	3.75 (-6)
10CFR100 limits		300	25	300	25

*Realistic analysis based on 50th percentile meteorology.
Conservative analysis based on 5th percentile meteorology.

Note: 2.89 (+1) = 2.89×10^1

BRAIDWOOD-UFSAR

TABLE 15.0-12 (Cont'd)

POSTULATED ACCIDENT	UFSAR SECTION	<u>DOSE (2 HOURS) AT EXCLUSION</u> <u>AREA BOUNDARY</u> (485 meters)		<u>DOSE (COURSE OF ACCIDENT) AT</u> <u>LOW POPULATION ZONE</u> (1811 meters)	
		THYROID (REM)	WHOLE BODY (REM)	THYROID (REM)	WHOLE BODY (REM)
Process Gas System Rupture	15.7.1				
Conservative		0	1.38 (+0)	0	1.27 (-1)
Realistic		0	7.11 (-3) 4	0	6.62 (-4) 3
Radioactive Liquid Waste System Failure	15.7.3				
Spent Resin Tank		3.83 (-1)	1.40 (-4)	3.50 (-2)	1.00 (-5)
Recycle Holdup Tank		1.30 (-4)	3.40 (-1)	1.20 (-3)	3.10 (-2)
Fuel Handling Accident in Con- tainment	15.7.4				
Conservative					
Realistic					
In Fuel Building					
Conservative		3.30 (+1)	9.86 (-1)	3.05 (+0)	9.09 (-2)
Realistic		1.50 (-3)	1.77 (-4)	1.39 (-4)	1.65 (-5)
10CFR100 limits		300	25	300	25

*Realistic analysis based on 50th percentile meteorology.

Conservative analysis based on 5th percentile meteorology.

Note: 3.90 (+1) = 3.90×10^1

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS FOR PROPOSED CHANGES TO THE BYRON/BRAIDWOOD UFSAR

ComEd has evaluated this proposed change and determined that it involves no significant hazards considerations. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed change would not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;
2. Create the possibility of a new or different kind of accident from any previously analyzed; or
3. Involve a significant reduction in a margin of safety.

ComEd proposes to increase realistic whole body doses for the process gas system rupture accident above that previously reviewed and approved by the NRC as part of the licensing basis for the plant. The change is based on a revision to the dose calculation for that accident.

The determination that the criteria set forth in 10 CFR 50.92 are met for this request is indicated below:

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes involve a slight increase to the consequences of the waste gas decay tank rupture event as shown in UFSAR Tables 15.0-11 and 15.0-12. However, the values continue to be less than a small fraction of the 10 CFR 100 limits, i.e., 10 percent or 2.5 rem for whole-body dose. Standard Review Plan 11.3, Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Releases Due to a Waste Gas System Leak or Failure," in NUREG-0800, July 1981 imposes lower dose limits than 10 CFR 100 because the probability of an accidental release from the waste gas system is relatively high. The BTP establishes a limit of 0.5 rem to an individual at the nearest exclusion area boundary. The recalculated doses also meet this criterion.

All other aspects of the original accident event and analysis, as presented in UFSAR Subsection 15.7.1, are unchanged. The proposed changes do not impact any accident initiators or assumed mitigation of accident or transient events. They do not involve the addition or removal of any equipment, or any design changes to the facility. There is no change to the types of effluents released offsite. The source terms in UFSAR Table

15.7-2 are unaffected. The change affects only the post-accident dose; there is no impact on individual or cumulative occupational radiation exposure. Therefore, this request does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes do not involve a modification to the physical configuration of the plant (i.e. no new equipment will be installed) or change in the methods governing normal plant operation. The proposed changes will not impose any new or different requirements or introduce a new accident or malfunction mechanism. The proposed change affects only a calculation to determine dose following an event that has been previously analyzed. It has no impact on any event in the accident sequence, and no new failures are created. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The proposed changes do not result in any reduction in the margin of safety because they have no impact on safety analysis assumptions. Technical Specification 3.11.2.6 restricts the quantity of radioactivity contained in each gas storage tank to provide assurance that, in the event of an uncontrolled release of the tank's contents, the resulting whole body exposure will not exceed 0.5 rem, as established in BTP ETSB 11-5. The gas decay tank activity is limited to 50,000 curies of noble gas as Xe-133 equivalent. Since this activity limit is not affected and the calculated dose is less than 0.5 rem, the margin of safety remains the same.

Therefore, based upon the above evaluation, Commonwealth Edison has concluded that these changes involve no significant hazards considerations.

ATTACHMENT D

ENVIRONMENTAL ASSESSMENT FOR PROPOSED CHANGES TO THE BYRON/BRAIDWOOD UFSAR

Commonwealth Edison Company (ComEd) has evaluated this proposed license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with Title 10, Code of Federal Regulations, Part 51, Section 21 (10 CFR 51.21). ComEd has determined that this proposed license amendment request meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or that changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria:

- (i) the amendment involves no significant hazards considerations

As demonstrated in Attachment C, this proposed amendment does not involve any significant hazards considerations.

- (ii) there is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite

As documented in Attachment C, there will be no change in the types or significant increase in the amounts of any effluents released offsite.

- (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not result in changes in the operation or configuration of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels within the plant. Although dose increases slightly, the change is not significant with respect to 10 CFR 100 limits. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from this change.