

February 23, 2000

Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: BYRON - COMPLETION OF LICENSING ACTION FOR GENERIC LETTER
98-02 (TAC NOS. MA4774 AND MA4775)

Dear Mr. Kingsley:

On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02, "Loss of Reactor Coolant Inventory and Associated Potential for Loss of Emergency Mitigation Functions While in a Shutdown Condition," to all holders of operating licenses for Pressurized Water Reactors (PWR), except those who have permanently ceased operations, and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event, which occurred at Wolf Creek, which had the potential to drain down the reactor coolant system to the refueling water storage tank and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2), if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes which would prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

In response to GL 98-02, Commonwealth Edison Company (ComEd) provided a letter dated November 24, 1998, for Byron Station, Units 1 and 2 (Byron). The submittal indicated that Byron was vulnerable to the type of incident which occurred at Wolf Creek and further indicated that the plant evaluation concerning the subject vulnerability (information item (2) of GL 98-02), was being kept in a retrievable licensee system that the NRC could verify on an as-needed or sample basis, in accordance with GL 98-02.

By letter dated December 21, 1999, the NRC Region III staff issued NRC Inspection Report Nos. 50-454/99-19; 50-455/99-19 which contained a summary of the NRC staff's on-site verification of activities which ComEd undertook in response to GL 98-02 for Byron. Specifically, the inspectors verified that administrative controls, configuration management, and operating procedures to preclude an inadvertent draindown event as described in GL 98-02 were effectively implemented. The residual heat removal system (RH) recirculation to refueling water storage tank manual isolation valves (valves 1/2RH8735) were identified as points of

vulnerability. The inspectors noted that the valves were maintained as locked closed and that operation of the valves was controlled by procedures. In addition, the procedures required that an operator be stationed by the valves whenever they are opened. The inspectors verified that these valves were accessible and that they were locked closed. ComEd's corrective actions for this issue included the following: (1) placing limitations on the use of the valves while the RH system is in the shutdown cooling mode; (2) implementing appropriate procedure modifications; (3) requiring an operator to be present at the manual recirculation valve any time the valves are open; (4) presenting and discussing the events in the operator training program; and (5) using high level awareness briefings for greater operator awareness for this type of evolution.

Based on the review of ComEd's response to GL 98-02 and the results of the on-site inspection of the corrective actions, the NRC staff has concluded that; (1) all of the information requested by GL 98-02 has been provided, and (2) that the on-site activities adequately addressed the concerns of GL 98-02. Therefore, we consider GL 98-02 to be closed for Byron Station, Units 1 and 2.

Sincerely,

/RA/

George F. Dick, Jr., Sr. Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454 and STN 50-455

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Byron Station
Units 1 and 2

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Byron Station
Units 1 and 2

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