have been identified, in the "wedge" locations of the SG TSPs, that demonstrate the potential for tube collapse during a LOCA + SSE event. Because of this potential, these tubes have been excluded from application of the voltage-based SG TSP APC.

ComEd has implemented a maximum primary to secondary leakage limit of 150 gallons per day (gpd) through any one SG at Braidwood to help preclude the potential for excessive leakage during all plant conditions. The 150 gpd limit provides for leakage detection and plant shutdown in the event of an unexpected single crack leak associated with the longest permissible free span crack length. The 150 gpd limit provides adequate leakage detection and plant shutdown criteria in the event an unexpected single crack results in leakage that is associated with the longest permissible free span crack length. Since tube burst is precluded during normal operation due to the proximity of the TSP to the tube and the potential exists for the crevice to become uncovered during MSLB conditions, the leakage from the maximum permissible crack must preclude tube burst at MSLB conditions. Thus, the 150 gpd limit provides a conservative limit to prompt plant shutdown prior to reaching critical crack lengths under MSLB conditions.

Calculations conducted for Braidwood have shown that the resulting 2-hour doses at the site boundaries will not currently exceed an appropriately small fraction of 10 CFR 100 dose guideline values in conjunction with the predicted MSLB leakage calculated in accordance with this submittal and a DE I-131 level of 1.0 µCi/gm. The site allowable leakage calculated using a DE I–131 level of 1.0 µCi/gm is 9.4 gpm. This leakage includes accident leakage and the allowed 0.1 gpm primary-to-secondary leakage of the 3 unfaulted SGs per TS 3.4.6.2.c. However, in order to provide a defense in depth approach to application of this requested APC and to envelope any future increases in MSLB leakage due to tube degradation, Braidwood is lowering the RCS DE I-131 levels to 0.35 µCi/gm for all future cycles until SG replacement. The site allowable leak rate calculated using 0.35 µCi/ gm DE I–131 is 26.8 gpm. This leakage also includes accident leakage and the allowed 0.1 gpm primary-to-secondary leakage of the 3 unfaulted SGs per TS 3.4.6.2.c. Lowering the Braidwood Unit 1 RCS DE I-131 concentration limit to the 0.35 µCi/gm is conservative and will not introduce any changes to the design basis for Braidwood Station.

Modification of the Braidwood Specifications for conformance with Generic Letter 95–05 requirements will not alter the plant design basis. The decrease in the allowed burst probability from 2.5×10^{-2} to 1.0×10^{-2} is conservative.

Upon renewal of the 1.0 volt APC for Braidwood Unit 1, steam generator tube integrity continues to be maintained through inservice inspection and primary-tosecondary leakage monitoring. Therefore, the possibility of a new or different kind of accident from any previously evaluated is not created.

3. The proposed change does not involve a significant reduction in a margin of safety.

The use of the voltage based bobbin coil probe SG TSP APC for Braidwood Unit 1 will maintain steam generator tube integrity commensurate with the criteria of RG 1.121 as discussed above. Upon implementation of the criteria, even under the worst case conditions, the occurrence of ODSCC at the TSP elevations is not expected to lead to a steam generator tube rupture event during normal or faulted plant conditions. The distribution of crack indications at the TSP elevations results in acceptable primary-tosecondary leakage during all plant conditions and radiological consequences are not adversely impacted by the application of APC.

The installation of SG tube plugs and sleeves reduces the RCS flow margin. As noted previously, renewal of the SG TSP APC will decrease the number of tubes which must be repaired by plugging or sleeving. Thus, renewal of APC will retain additional flow margin that would otherwise be reduced due to increased tube plugging. Therefore, no significant reduction in the margin of safety will occur as a result of this proposed license amendment request.

Although not relied upon to prove adequacy of the proposed amendment request, the following analyses demonstrate that significant conservatisms exist in the methods and justifications described above:

Limited Tube Support Plate Displacement

An analysis was performed to verify the extent of limited TSP displacement during accident conditions (MSLB). Application of minimum TSP displacement assumptions provides conservatism and reduces the likelihood of a tube burst to negligible levels. Consideration of limited TSP displacement would also reduce potential MSLB leakage when compared to the leakage calculated assuming free span indications.

Probability of Detection

The Electric Power Research Institute (EPRI) Performance Demonstration Program analyzed the performance of approximately 20 eddy current data analysts evaluating data from a unit with $\frac{3}{4}$ " inside diameter and 0.043" wall thickness tubes. The results of this analysis clearly show that the detectability of larger voltage indications is increased which lends creditability for application of a POD of > 0.6 for ODSCC indications larger than 1.0 volt.

Risk Evaluation of Core Damage

As part of ComEd's evaluation of the operability of Braidwood Unit 1, a risk evaluation was completed. The objective of this evaluation was to compare core damage frequency under containment bypass conditions, with and without the APC applied at Braidwood Unit 1. The total Braidwood core damage frequency is estimated to be 3.09E-5 per reactor year with a total contribution from containment bypass sequences of 3.72E-8 per reactor year according to the results of the current individual plant evaluation (IPE). Operation with the requested APC resulted in an insignificant increase in core damage frequency resulting from MSLB with containment bypass conditions.

Calculations conducted for Braidwood have shown that the resulting 2-hour doses

at the site boundaries will not currently exceed an appropriately small fraction of 10 CFR 100 dose guideline values in conjunction with the predicted MSLB leakage calculated in accordance with this submittal and a DE I-131 level of 1.0 µCi/gm. The site allowable leakage calculated using a DE I-131 level of 1.0 µCi/gm is 9.4 gpm. This leakage includes accident leakage and the allowed 0.1 gpm primary-to-secondary leakage of the 3 unfaulted SGs per TS 3.4.6.2.c. However, in order to provide a defense in depth approach to application of this requested APC and to envelope any future increases in MSLB leakage due to tube degradation, Braidwood is lowering the RCS DE I-131 levels to 0.35 µCi/gm for all future cycles until SG replacement. The site allowable leak rate calculated using 0.35 $\mu Ci/$ gm DE I-131 is 26.8 gpm. This leakage also includes accident leakage and the allowed 0.1 gpm primary-to-secondary leakage of the 3 unfaulted SGs per TS 3.4.6.2.c. Lowering the Braidwood Unit 1 RCS DE I-131 concentration limit to the 0.35 µCi/gm is conservative and will not introduce any changes to the design basis for Braidwood Station. Thus this change is in conformance with Braidwood's current TS and does not involve a reduction in a margin of safety.

Modification of the Braidwood Specifications for conformance with Generic Letter 95–05 requirements will not reduce any safety margins. The decrease in the allowed burst probability from 2.5×10^{-2} to 1.0×10^{-2} is conservative.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

The Commission is seeking public comments on this proposed determination. Any comments received within 30 days after the date of publication of this notice will be considered in making any final determination.

Normally, the Commission will not issue the amendments until the expiration of the 30-day notice period. However, should circumstances change during the notice period such that failure to act in a timely way would result, for example, in derating or shutdown of the facility, the Commission may issue the license amendments before the expiration of the 30-day notice period, provided that its final determination is that the amendments involve no significant hazards consideration. The final determination will consider all public and State comments received. Should the Commission take this action, it will publish in the Federal Register a notice of issuance and provide for opportunity for a hearing after issuance. The Commission expects that the need to