1.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR20.1301?	_x_Yes	-
	Explain:		
	This ODCM change will maintain the radioactive effluent control required by 10CFR20.1301, Dose Limits for Individual Members of the Public, which is to ensure total effective dose equivalent to individual members of the public from licensed operation does not exceed 0.1rem.		
	Determination A changes are administrative in nature. The changes include adding clarification to REMP air sampler location table references, adding "continued" to table titles, darkening of flow diagram lines, and correction of typos.		
	None of these administrative changes affect the radioactive effluent control required by 10CFR20.1301.		
2.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR20.1302?	_x_Yes	
	Explain:		
	This ODCM change will maintain the level of control required in 10CFR20. The requirement of 10CFR20.1302 is to provide "surveys of radiation levels in unrestricted and controlled areas and radioactive materials in effluents released to unrestricted and controlled areas to demonstrate compliance with the dose limits for individual members of the public in 10CFR20.1301."	9 0	
	Determination A changes are administrative in nature. The changes include adding		
	clarification to REMP air sampler location table references, adding "continued" to table titles, darkening of flow diagram lines, and correction of typos.		1

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ODCM Revision No: 15	Determination Identifier: A – Administrative Changes

	-		_x_Yes	No
	3.	Does the ODCM change maintain the level of radioactive effluent control required by 40CFR190 and 10CFR72.104?		
		Explain:		
		This ODCM change will not reduce the control required by 40CFR190. The controls required by 40CFR190 and 10CFR72.104 include limiting the annual dose equivalent of any member of the public to less than 25 mrem whole body, 75 mrem thyroid, and 25 mrem to any organ as the result of activities from the uranium fuel cycle, including direct radiation from ISFSI.		
ſ		Determination A changes are administrative in nature. The changes include adding clarification to REMP air sampler location table references, adding "continued" to table titles, darkening of flow diagram lines, and correction of typos.		
		None of these changes affect the ability to maintain radioactive effluent and direct radiation controls required by 40CFR190 and 10CFR72.104.		
	4.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR50.36a?	_x_Yes	No
		Explain:		
		This ODCM change does not affect the level of control previously established in the ODCM required by 10CFR50.36a. The basic requirement of 10CFR50.36a is to keep releases and the resultant dose to the public as low as reasonably achievable (ALARA). This ODCM change will not reduce the station's ability to keep releases of radioactive materials to unrestricted areas as low as reasonably achievable, as required by 10CFR50.36a.		
		Determination A changes are administrative in nature. The changes include adding clarification to REMP air sampler location table references, adding "continued" to table titles, darkening of flow diagram lines, and correction of typos.		
		None of these administrative changes affect the radioactive effluent control required by 10CFR50.36a.		
	5.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR50 Appendix I?	_x_Yes	No
		Explain:		
		10CFR50 Appendix I states that liquid effluents from each reactor each year shall not expose any individual to more than 3 mrem to the total body or 10 mrem to any critical organ. Gaseous releases of particulates and iodines with half-lives >8 days shall not expose any individual organ to more than 15 mrem/year. Noble gases shall not expose any individual total body to more than 500 mrem/year, skin to more than 3000 mrem/year, gamma dose to 10 mrad/year, and beta dose to 20 mrad/year.		
		Determination A changes are administrative in nature. The changes include adding clarification to REMP air sampler location table references, adding "continued" to table titles, darkening of flow diagram lines, and correction of typos.		
		None of these administrative changes affect the radioactive effluent control required by 10CFR50 Appendix I.		
	6.	Does the ODCM change maintain the accuracy or reliability of effluent, dose, or setpoint calculations?	_x_Yes	No
		Explain:		
		The accuracy and reliability of effluent, dose, and setpoint calculations will not be affected by		

Station:	Byron		
ODCM F	Revision No: 15 Determination Identifier: A - Administrative Changes		
	this ODCM change. Effluent and setpoint calculations will continue to be performed using the established ODCM methodology.		
	Determination A changes are administrative in nature. The changes include adding clarification to REMP air sampler location table references, adding "continued" to table titles darkening of flow diagram lines, and correction of typos.	s,	
	None of these administrative changes affect the accuracy or reliability of effluent, dose, or setpoint calculations.		
7.	Does the ODCM change maintain the accuracy of radioactive effluent control required by the FSAR?	_x_Yes	No
	Explain:		
	This ODCM change will maintain the accuracy of the radioactive effluent control required by the Byron/Braidwood UFSAR. The B/B UFSAR Table 11.5-6, Radiological Analysis Summary of Gaseous Effluent Samples, includes typical sampling frequency, type of analysis, sensitivity, and purpose for effluent radiation monitors. No UFSAR described effluent samples or monitors are affected by this change.		
	Determination A changes are administrative in nature. The changes include adding clarification to REMP air sampler location table references, adding "continued" to table titles darkening of flow diagram lines, and correction of typos.	s,	
	None of these administrative changes affect the accuracy of radioactive effluent control required by the FSAR.		

Station: Byron

OCM F	Revision No: 15Determination Identifier: <u>B - SGBD Overboard Modification</u> ,	EC #624333	
1.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR20.1301?	_x_Yes	
	Explain:		
	This ODCM change will maintain the radioactive effluent control required by 10CFR20.1301, Dose Limits for Individual Members of the Public, which is to ensure total effective dose equivalent to individual members of the public from licensed operation does not exceed 0.1 rem.		
	This EC installed piping to allow SGBD water at a total flow rate of up to 100 gpm per unit to bypass the SGBD demineralizers and be routed directly to the CP trench to extend the life of the SGBD demineralizers, allow overall reduction in SGBD flow, and recover therm output. The EC increases the amount of water being discharged, which normally contain tritium. However, the amount of tritium present in secondary process water when discharged is negligible compared to the amount of tritium being discharged via liquid release tanks. Therefore, this modification has no impact to offsite dose calculations.	nal	
	This ODCM change does not affect any radioactive effluent control required by 10CFR20.1301. The change is only being made to the ODCM drawing to reflect the new flow path, which continues to be through a monitored effluent pathway.	,	
2.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR20.1302?	_x_Yes	-
	Explain:		
	This ODCM change will maintain the level of control required in 10CFR20. The requirement of 10CFR20.1302 is to provide "surveys of radiation levels in unrestricted are controlled areas and radioactive materials in effluents released to unrestricted and controlled areas to demonstrate compliance with the dose limits for individual members of the public in 10CFR20.1301."		
	This EC installed piping to allow SGBD water at a total flow rate of up to 100 gpm per un to bypass the SGBD demineralizers and be routed directly to the CP trench to extend the life of the SGBD demineralizers, allow overall reduction in SGBD flow, and recover them output. The EC increases the amount of water being discharged, which normally contain tritium. However, the amount of tritium present in secondary process water when discharged is negligible compared to the amount of tritium being discharged via liquid release tanks. Therefore, this modification has no impact to offsite dose calculations.	e nal	
	The change to ODCM Figure 2-1 does not affect any radioactive effluent controls require by 10CFR20.1302. The change is only being made to the ODCM drawing to reflect the new flow path, which continues to be through a monitored effluent pathway.		
3.	Does the ODCM change maintain the level of radioactive effluent control required by	_x_Yes	-

The change to ODCM Figure 2-1 does not affect any radioactive effluent controls required by 10CFR20.1302. The change is only being made to the ODCM drawing to reflect the new flow path, which continues to be through a monitored effluent pathway.

Does the ODCM change maintain the level of radioactive effluent control required by 40CFR190 and 10CFR72.104?

Explain:

This ODCM change will not reduce the control required by 40CFR190. The controls required by 40CFR190 and 10CFR72.104 include limiting the annual dose equivalent of any member of the public to less than 25 mrem whole body, 75 mrem thyroid, and 25 mrem to any organ as the result of activities from the uranium fuel cycle, including direct radiation from ISFSI.

This EC installed piping to allow SGBD water at a total flow rate of up to 100 gpm per unit to bypass the SGBD demineralizers and be routed directly to the CP trench to extend the life of the SGBD demineralizers, allow overall reduction in SGBD flow, and recover thermal output. The EC increases the amount of water being discharged, which normally contains tritium. However, the amount of tritium present in secondary process water when discharged is negligible compared to the amount of tritium being discharged via liquid release tanks. Therefore, this modification has no impact to offsite dose calculations.

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Station:_	Byron		
ODCM F	ODCM Revision No: 15 Determination Identifier: B – SGBD Overboard Modification, EC		
		T	
	This ODCM revision does not affect radioactive effluent or direct radiation controls and therefore maintains the level of radioactive effluent control required by 40CFR190 and 10CFR 72.104. The change is only being made to the ODCM drawing to reflect the new flow path, which continues to be through a monitored effluent pathway.		
4.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR50.36a?	_x_Yes	No
	Explain:		
	The basic requirement of 10CFR50.36a is to keep releases and the resultant dose to the public as low as reasonably achievable (ALARA).		
	This EC installed piping to allow SGBD water at a total flow rate of up to 100 gpm per unit to bypass the SGBD demineralizers and be routed directly to the CP trench to extend the life of the SGBD demineralizers, allow overall reduction in SGBD flow, and recover thermal output. The EC increases the amount of water being discharged, which normally contains tritium. However, the amount of tritium present in secondary process water when discharged is negligible compared to the amount of tritium being discharged via liquid release tanks. Therefore, this modification has no impact to offsite dose calculations.		
	This ODCM revision does not reduce the station's ability to keep releases of radioactive materials to unrestricted areas as low as reasonably achievable, and therefore does not affect the level of control previously established in the ODCM required by 10CFR50.36a. The change is only being made to the ODCM drawing to reflect the new flow path, which continues to be through a monitored effluent pathway.		

Station: Byron	
ODCM Revision No: 15	Determination Identifier: B - SGBD Overboard Modification, EC #624333
	V

		v Von I	No
5.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR50 Appendix I?	_x_Yes	
	Explain:		
	10CFR50 Appendix I states that liquid effluents from each reactor each year shall not expose any individual to more than 3 mrem to the total body or 10 mrem to any critical organ. Gaseous releases of particulates and iodines with half-lives >8 days shall not expose any individual organ to more than 15 mrem/year. Noble gases shall not expose any individual total body to more than 500 mrem/year, skin to more than 3000 mrem/year, gamma dose to 10 mrad/year, and beta dose to 20 mrad/year.		
	This EC installed piping to allow SGBD water at a total flow rate of up to 100 gpm per unit to bypass the SGBD demineralizers and be routed directly to the CP trench to extend the life of the SGBD demineralizers, allow overall reduction in SGBD flow, and recover thermal output. The EC increases the amount of water being discharged, which normally contains tritium. However, the amount of tritium present in secondary process water when discharged is negligible compared to the amount of tritium being discharged via liquid release tanks. Therefore, this modification has no impact to offsite dose calculations.		
	This ODCM revision does not affect the amount of liquid and gaseous effluent releases required to maintain the level of radioactive effluent control required by 10CFR50 Appendix I. The change is only being made to the ODCM drawing to reflect the new flow path, which continues to be through a monitored effluent pathway.		
6.	Does the ODCM change maintain the accuracy or reliability of effluent, dose, or setpoint calculations?	_x_Yes	No
	Explain:		
	This EC installed piping to allow SGBD water at a total flow rate of up to 100 gpm per unit to bypass the SGBD demineralizers and be routed directly to the CP trench to extend the life of the SGBD demineralizers, allow overall reduction in SGBD flow, and recover thermal output. The EC increases the amount of water being discharged, which normally contains tritium. However, the amount of tritium present in secondary process water when discharged is negligible compared to the amount of tritium being discharged via liquid release tanks. Therefore, this modification has no impact to offsite dose calculations.		
	The accuracy and reliability of effluent, dose, and setpoint calculations will not be affected by this ODCM change. The change is only being made to the ODCM drawing to reflect the new flow path, which continues to be through a monitored effluent pathway.		
7.	Does the ODCM change maintain the accuracy of radioactive effluent control required by the FSAR?	_x_Yes	No
	Explain:		
	This ODCM change will maintain the accuracy of the radioactive effluent control required by the Byron/Braidwood UFSAR. The B/B UFSAR Section 11.2 describes liquid radwaste management systems and concentrations and doses expected from liquid releases. The B/B UFSAR Section 11.5 describes process and effluent radiological monitoring and sampling systems.		
	This EC installed piping to allow SGBD water at a total flow rate of up to 100 gpm per unit to bypass the SGBD demineralizers and be routed directly to the CP trench to extend the life of the SGBD demineralizers, allow overall reduction in SGBD flow, and recover thermal output. The EC increases the amount of water being discharged, which normally contains tritium. However, the amount of tritium present in secondary process water when discharged is negligible compared to the amount of tritium being discharged via liquid release tanks. Therefore, this modification has no impact to offsite dose calculations.		
	The revision to ODCM Figure 2-1 does not affect the ability to maintain the accuracy of radioactive effluent control required by the FSAR. The change is only being made to the		

Station: Byron		
ODCM Revision No: 15 Determination Identifier: B - SGBD Overboard Modification, EC #		‡62433 <u>3</u>
ODCM drawing to refle	ct the new flow path, which continues to be through a monitored	

	Revision No: <u>15</u> 7/402668)	_Determination Identifier: <u>C - Bypass of U1/U2 SJAE offgas filter</u>	units, EC	
#402007	<u>14020001</u>			
1.	Does the ODCM change m 10CFR20.1301?	aintain the level of radioactive effluent control required by	_x_Yes	No
	Explain:			
	10CFR20.1301, Dose Limit	aintain the radioactive effluent control required by ts for Individual Members of the Public, which is to ensure total or individual members of the public from licensed operation does		
	System Vent Stack Isolatio position. Originally, the system Vent Stack Isolation position. Originally, the system of the system	wed the existing actuators from 1/20G035, Unit 1/2 Off Gas (OG) on Valve(s), and installed a block to restrain the valve in the open stem was designed to route flow through the charcoal filter unit ation in the steam jet air ejector (SJAE) exhaust. However, the yon in plant operation due to problems with wetting the charcoal ugh 1/20G035 as the only vent path for the exhaust of the and SJAEs. As such, 1/20G035 represented a significant single that it would cause a loss of condenser vacuum potentially factor power if it were to spuriously close. Removal of the a block ensured that the valve remains in the open position at all or radioiodines in the event of a high rad alarm has been alcs associated with these modifications concluded that the differ units does not result in a significant increase in radioactive ablic. ODCM figures were updated to reflect the new plant DDCM revisions, however, the ODCM Section 1.24 Ventilation on definition was not updated as recommended in EC 402667. The ated to include the words "as required" when describing how the ent systems are designed and installed to reduce gaseous material in particulate form in effluents by passing ventilation or the charcoal adsorbers. Since no changes are being made to the being performed, the resultant doses are unchanged, and the		
	radioactive effluent control	required by 10CFR20.1301 is maintained.		
2.	Does the ODCM change in 10CFR20.1302?	naintain the level of radioactive effluent control required by	_x_Yes	No
	Explain:			
	requirement of 10CFR20.1 controlled areas and radio	aintain the level of control required in 10CFR20. The 1302 is to provide "surveys of radiation levels in unrestricted and active materials in effluents released to unrestricted and strate compliance with the dose limits for individual members of 01."		
	System Vent Stack Isolatic position. Originally, the sy OG01S upon sensing radifilter unit was isolated earl. That left the flow path thro vacuum hogging pumps a point vulnerability (SPV) in leading to a reduction in reactuator and installation of times, but the ability to filted.	oved the existing actuators from 1/2OG035, Unit 1/2 Off Gas (OG) on Valve(s), and installed a block to restrain the valve in the open stem was designed to route flow through the charcoal filter unit ation in the steam jet air ejector (SJAE) exhaust. However, the y on in plant operation due to problems with wetting the charcoal hugh 1/2OG035 as the only vent path for the exhaust of the nd SJAEs. As such, 1/2OG035 represented a significant single in that it would cause a loss of condenser vacuum potentially eactor power if it were to spuriously close. Removal of the f a block ensured that the valve remains in the open position at all the radioiodines in the event of a high rad alarm has been radios associated with these modifications concluded that the		

Station: Byron			
ODCM Revision No: <u>15</u> #402667/402668)	Determination Identifier: C - Bypass of U1/U2 SJAE offgas filter	units, EC	
materials or dose to the processing configuration in previous	e filter units does not result in a significant increase in radioactive public. ODCM figures were updated to reflect the new plant ODCM revisions, however, the ODCM Section 1.24 Ventilation em definition was not updated as recommended in EC 402667.		
ventilation exhaust treat radioiodine or radioactive vent exhaust gases thro way dose calculations ar change does not affect ti	podated to include the words "as required" when describing how ment systems are designed and installed to reduce gaseous e material in particulate form in effluents by passing ventilation or ugh charcoal adsorbers. Since no changes are being made to the re being performed, the resultant doses are unchanged, and this he ability to provide surveys of radiations levels and maintains the ctive materials required by 10CFR20.		

	Revision No: 15Determination Identifier: C - Bypass of U1/U2 SJAE offga 37/402668)	as filter units, E	<u>:C</u>
3.	Does the ODCM change maintain the level of radioactive effluent control required by 40CFR190 and 10CFR72.104?	x Ye	s No
	Explain:		
	This ODCM change will not reduce the control required by 40CFR190. The controls required by 40CFR190 and 10CFR72.104 include limiting the annual dose equivalent any member of the public to less than 25 mrem whole body, 75 mrem thyroid, and 25 to any organ as the result of activities from the uranium fuel cycle, including direction radiation from ISFSI.		
	ECs 402667/402668 removed the existing actuators from 1/20G035, Unit 1/2 Off Gas System Vent Stack Isolation Valve(s), and installed a block to restrain the valve in the position. Originally, the system was designed to route flow through the charcoal filter OG01S upon sensing radiation in the steam jet air ejector (SJAE) exhaust. However, filter unit was isolated early on in plant operation due to problems with wetting the cha That left the flow path through 1/20G035 as the only vent path for the exhaust of the vacuum hogging pumps and SJAEs. As such, 1/20G035 represented a significant sir point vulnerability (SPV) in that it would cause a loss of condenser vacuum potentially leading to a reduction in reactor power if it were to spuriously close. Removal of the actuator and installation of a block ensured that the valve remains in the open position times, but the ability to filter radioiodines in the event of a high rad alarm has been eliminated. Engineering calcs associated with these modifications concluded that the permanent bypass of the filter units does not result in a significant increase in radioact materials or dose to the public. ODCM figures were updated to reflect the new plant configuration in previous ODCM revisions, however, the ODCM Section 1.24 Ventilation Exhaust Treatment System definition was not updated as recommended in EC 40266. The definition is being updated to include the words "as required" when describing howentilation exhaust treatment systems are designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation vent exhaust gases through charcoal adsorbers. Since no changes are being made to way dose calculations are being performed, the resultant doses are unchanged, and the ventilation to the proper in the	open unit the rcoal. ngle at all tive on 7.	
	change does not affect the ability to maintain the radioactive effluent or direct radiation controls required by 40CFR190 and 10CFR 72.104.		
4.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR50.36a?	_x_Y	esNo
	Explain:		
	This ODCM change does not affect the level of control previously established in the C required by 10CFR50.36a. The basic requirement of 10CFR50.36a is to keep release the resultant dose to the public as low as reasonably achievable (ALARA). This ODC change will not reduce the station's ability to keep releases of radioactive materials to unrestricted areas as low as reasonably achievable, as required by 10CFR50.36a.	es and M	
	ECs 402667/402668 removed the existing actuators from 1/20G035, Unit 1/2 Off Gas System Vent Stack Isolation Valve(s), and installed a block to restrain the valve in the position. Originally, the system was designed to route flow through the charcoal filter OG01S upon sensing radiation in the steam jet air ejector (SJAE) exhaust. However, filter unit was isolated early on in plant operation due to problems with wetting the charcoal filter unit he flow path through 1/20G035 as the only vent path for the exhaust of the vacuum hogging pumps and SJAEs. As such, 1/20G035 represented a significant si point vulnerability (SPV) in that it would cause a loss of condenser vacuum potentially leading to a reduction in reactor power if it were to spuriously close. Removal of the actuator and installation of a block ensured that the valve remains in the open position times, but the ability to filter radioiodines in the event of a high rad alarm has been	e open unit the arcoal.	

Station: Byron	
ODCM Revision No: 15 #402667/402668)	_Determination Identifier: C - Bypass of U1/U2 SJAE offgas filter units, EC

eliminated. Engineering calcs associated with these modifications concluded that the permanent bypass of the filter units does not result in a significant increase in radioactive materials or dose to the public. ODCM figures were updated to reflect the new plant configuration in previous ODCM revisions, however, the ODCM Section 1.24 Ventilation Exhaust Treatment System definition was not updated as recommended in EC 402667.

The definition is being updated to include the words "as required" when describing how ventilation exhaust treatment systems are designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers. Since no changes are being made to the way dose calculations are being performed, the resultant doses are unchanged, and this change does not affect the ability to maintain releases of radioactivity to the unrestricted area ALARA.

	Revision No: 15 Determination Identifier: C - Bypass of U1/U2 SJAE offgas filter 7/402668)	units, EC	
5.	Does the ODCM change maintain the level of radioactive effluent control required by 10CFR50 Appendix I?	_x_Yes	No
	Explain:		
	10CFR50 Appendix I states that liquid effluents from each reactor each year shall not expose any individual to more than 3 mrem to the total body or 10 mrem to any critical organ. Gaseous releases of particulates and iodines with half-lives >8 days shall not expose any individual organ to more than 15 mrem/year. Noble gases shall not expose any individual total body to more than 500 mrem/year, skin to more than 3000 mrem/year, gamma dose to 10 mrad/year, and beta dose to 20 mrad/year.		
	ECs 402667/402668 removed the existing actuators from 1/20G035, Unit 1/2 Off Gas (OG) System Vent Stack Isolation Valve(s), and installed a block to restrain the valve in the open position. Originally, the system was designed to route flow through the charcoal filter unit OG01S upon sensing radiation in the steam jet air ejector (SJAE) exhaust. However, the filter unit was isolated early on in plant operation due to problems with wetting the charcoal. That left the flow path through 1/20G035 as the only vent path for the exhaust of the vacuum hogging pumps and SJAEs. As such, 1/20G035 represented a significant single point vulnerability (SPV) in that it would cause a loss of condenser vacuum potentially leading to a reduction in reactor power if it were to spuriously close. Removal of the actuator and installation of a block ensured that the valve remains in the open position at all times, but the ability to filter radioiodines in the event of a high rad alarm has been eliminated. Engineering calcs associated with these modifications concluded that the permanent bypass of the filter units does not result in a significant increase in radioactive materials or dose to the public. ODCM figures were updated to reflect the new plant configuration in previous ODCM revisions, however, the ODCM Section 1.24 Ventilation Exhaust Treatment System definition was not updated as recommended in EC 402667.		
	ventilation exhaust treatment systems are designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers. Since no changes are being made to the way dose calculations are being performed, the resultant doses are unchanged and this change does not affect the ability to meet Appendix I requirements.		
6.	Does the ODCM change maintain the accuracy or reliability of effluent, dose, or setpoint calculations?	_x_Yes	No
	Explain:]
	The accuracy and reliability of effluent and dose calculations will not be reduced. They will be unaffected or increased as a result of these changes. Setpoint calculations will not be affected.		
	ECs 402667/402668 removed the existing actuators from 1/20G035, Unit 1/2 Off Gas (OG) System Vent Stack Isolation Valve(s), and installed a block to restrain the valve in the open position. Originally, the system was designed to route flow through the charcoal filter unit OG01S upon sensing radiation in the steam jet air ejector (SJAE) exhaust. However, the filter unit was isolated early on in plant operation due to problems with wetting the charcoal. That left the flow path through 1/20G035 as the only vent path for the exhaust of the vacuum hogging pumps and SJAEs. As such, 1/20G035 represented a significant single point vulnerability (SPV) in that it would cause a loss of condenser vacuum potentially leading to a reduction in reactor power if it were to spuriously close. Removal of the actuator and installation of a block ensured that the valve remains in the open position at all times, but the ability to filter radioiodines in the event of a high rad alarm has been		

Station:_	Byron		
	Revision No: 15 Determination Identifier: C - Bypass of U1/U2 SJAE offgas filter 7/402668)	units, EC	
### #P # # # # # # # # # # # # # # # #	eliminated. Engineering calcs associated with these modifications concluded that the permanent bypass of the filter units does not result in a significant increase in radioactive materials or dose to the public. ODCM figures were updated to reflect the new plant configuration in previous ODCM revisions, however, the ODCM Section 1.24 Ventilation Exhaust Treatment System definition was not updated as recommended in EC 402667.		
	The definition is being updated to include the words "as required" when describing how ventilation exhaust treatment systems are designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers. Since no changes are being made to the way dose calculations are being performed, the resultant doses are unchanged, and this change does not reduce the accuracy or reliability of effluent, dose, or setpoint calculations.		
7.	Does the ODCM change maintain the accuracy of radioactive effluent control required by the FSAR?	_x_Yes	No
	Explain:		
	ECs 402667/402668 removed the existing actuators from 1/20G035, Unit 1/2 Off Gas (OG) System Vent Stack Isolation Valve(s), and installed a block to restrain the valve in the open position. Originally, the system was designed to route flow through the charcoal filter unit OG01S upon sensing radiation in the steam jet air ejector (SJAE) exhaust. However, the filter unit was isolated early on in plant operation due to problems with wetting the charcoal. That left the flow path through 1/20G035 as the only vent path for the exhaust of the vacuum hogging pumps and SJAEs. As such, 1/20G035 represented a significant single point vulnerability (SPV) in that it would cause a loss of condenser vacuum potentially leading to a reduction in reactor power if it were to spuriously close. Removal of the actuator and installation of a block ensured that the valve remains in the open position at all times, but the ability to filter radioiodines in the event of a high rad alarm has been eliminated. Engineering calcs associated with these modifications concluded that the permanent bypass of the filter units does not result in a significant increase in radioactive materials or dose to the public. ODCM figures were updated to reflect the new plant configuration in previous ODCM revisions, however, the ODCM Section 1.24 Ventilation Exhaust Treatment System definition was not updated as recommended in EC 402667.		
	The definition is being updated to include the words "as required" when describing how ventilation exhaust treatment systems are designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers. ODCM Figure 2-1 is being updated to reflect the removal of the filtration capability of the offgas filter unit. Since no changes are being made to the way dose calculations are being performed, the resultant doses are unchanged, and this change does not affect the accuracy of radioactive effluent control required by the FSAR.		
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ODCM F	Revision No: <u>15</u>	Determination Identifier: D – FSAR Footnote	<u>Update</u>		
1.	Does the ODCM chang by 10CFR20.1301?	ge maintain the level of radioactive effluent control	required	_x_Yes	No
	Explain:				
	10CFR20.1301, Dose I	Il maintain the radioactive effluent control required Limits for Individual Members of the Public, which i ose equivalent to individual members of the public s not exceed 0.1rem.	is to		
	Systems are required t Effluent Release Repo may choose to submit annual FSAR update."	changes to Liquid and Gaseous Radwaste Treatme to be reported to the NRC in the Annual Radioactiv rt. The ODCM contains a footnote that states "Lice the information called for in this standard as part o Station FSAR updates are now being performed note is being revised to reflect the biannual FSAR updates	re ensees f the		
		being made to the way dose calculations are being nt doses are unchanged, and the radioactive efflue 1301 is maintained.		And the second s	
2.	Does the ODCM chang by 10CFR20.1302?	ge maintain the level of radioactive effluent control	required	_x_Yes	No
	Explain:				
	requirement of 10CFR unrestricted and contro unrestricted and contro	ill maintain the level of control required in 10CFR20, 20.1302 is to provide "surveys of radiation levels in olled areas and radioactive materials in effluents recolled areas to demonstrate compliance with the does of the public in 10CFR20.1301."	n eleased to		
	Systems are required Effluent Release Repo may choose to submit annual FSAR update."	changes to Liquid and Gaseous Radwaste Treatm to be reported to the NRC in the Annual Radioaction. The ODCM contains a footnote that states "Lic the information called for in this standard as part of Station FSAR updates are now being performed note is being revised to reflect the biannual FSAR	ve ensees of the		
	performed, the resulta the ability to provide so	being made to the way dose calculations are being int doses are unchanged, and this change does no urveys of radiations levels and maintains the level is required by 10CFR20.	t affect		
3.	Does the ODCM chan by 40CFR190 and 100	ge maintain the level of radioactive effluent control CFR72.104?	required	_x_Yes	No
	Explain:				
	controls required by 40 dose equivalent of any mrem thyroid, and 25	vill not reduce the control required by 40CFR190. TOCFR190 and 10CFR72.104 include limiting the arrow member of the public to less than 25 mrem whole mrem to any organ as the result of activities from tocluding direction radiation from ISFSI.	nnual e body, 75		
	Systems are required Effluent Release Repo	changes to Liquid and Gaseous Radwaste Treatm to be reported to the NRC in the Annual Radioaction. The ODCM contains a footnote that states "Lic the information called for in this standard as part of	ve ensees		

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annual FSAR update." Station FSAR updates are now being performed	
biannually, so the footnote is being revised to reflect the biannual FSAR updates.	
Since no changes are being made to the way dose calculations are being performed, the resultant doses are unchanged, and this change does not affect the ability to maintain the radioactive effluent or direct radiation controls required by 40CFR190 and 10CFR 72.104.	

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4.	Does the ODCM chan by 10CFR50.36a?	nge maintain the level of radioactive effluent control required	_x_Yes	No
	Explain:			
	the ODCM required by to keep releases and t achievable (ALARA).	oes not affect the level of control previously established in y 10CFR50.36a. The basic requirement of 10CFR50.36a is the resultant dose to the public as low as reasonably. This ODCM change will not reduce the station's ability to pactive materials to unrestricted areas as low as reasonably and by 10CFR50.36a.		7
	Systems are required Effluent Release Reportant Choose to submit annual FSAR update.	r changes to Liquid and Gaseous Radwaste Treatment to be reported to the NRC in the Annual Radioactive ort. The ODCM contains a footnote that states "Licensees t the information called for in this standard as part of the "Station FSAR updates are now being performed tnote is being revised to reflect the biannual FSAR updates.		
	performed, the resulta	e being made to the way dose calculations are being ant doses are unchanged, and this change does not affect releases of radioactivity to the unrestricted area ALARA.		
5.	Does the ODCM char by 10CFR50 Appendi	nge maintain the level of radioactive effluent control required ix I?	_x_Yes	No
	Explain:			
	not expose any individually critical organ. Gadays shall not expose gases shall not expose	states that liquid effluents from each reactor each year shall dual to more than 3 mrem to the total body or 10 mrem to asseous releases of particulates and iodines with half-lives >8 any individual organ to more than 15 mrem/year. Noble se any individual total body to more than 500 mrem/year, ski rem/year, gamma dose to 10 mrad/year, and beta dose to 20	n	
	Systems are required Effluent Release Rep may choose to submi annual FSAR update.	r changes to Liquid and Gaseous Radwaste Treatment do be reported to the NRC in the Annual Radioactive port. The ODCM contains a footnote that states "Licensees it the information called for in this standard as part of the" Station FSAR updates are now being performed otnote is being revised to reflect the biannual FSAR updates.		
		e being made to the way dose calculations are being ant doses are unchanged and this change does not affect the dix I requirements.	е	
6.	Does the ODCM char setpoint calculations?	nge maintain the accuracy or reliability of effluent, dose, or ?	_x_Yes	No
	Explain:			
		liability of effluent and dose calculations will not be reduced. ed or increased as a result of these changes. Setpoint be affected.		
	Systems are required	or changes to Liquid and Gaseous Radwaste Treatment d to be reported to the NRC in the Annual Radioactive port. The ODCM contains a footnote that states "Licensees		

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may choose to submit the information called for in this standard as part of the annual FSAR update." Station FSAR updates are now being performed biannually, so the footnote is being revised to reflect the biannual FSAR updates.		
Since no changes are being made to the way dose calculations are being performed, the resultant doses are unchanged, and this change does not reduce the accuracy or reliability of effluent, dose, or setpoint calculations.		
Does the ODCM change maintain the accuracy of radioactive effluent control required by the FSAR?	_x_Yes	No
Explain:		
Per the ODCM, major changes to Liquid and Gaseous Radwaste Treatment Systems are required to be reported to the NRC in the Annual Radioactive Effluent Release Report. The ODCM contains a footnote that states "Licensees may choose to submit the information called for in this standard as part of the annual FSAR update." Station FSAR updates are now being performed biannually, so the footnote is being revised to reflect the biannual FSAR updates. Since no changes are being made to the way dose calculations are being performed, the resultant doses are unchanged, and this change does not affect the accuracy of radioactive effluent control required by the FSAR.		
		4.6
Prepared by: Dat	e: 2 -	8-17
$\rho \sim 10^{-10}$	e: <u>2-8-</u>	

Byron Station ODCM Revision 15 Change Summary Matrix

Administrative Changes - Determination A

Technical Changes (SGBD Overboard Modification, EC #624333) - Determination B

Technical Changes (Bypass of U1/U2 SJAE offgas filter units, EC #402667/402668) - Determination C

Technical Changes (FSAR Footnote Update) - Determination D

Item No.	(old) Rev. page No.	(new) Rev. page No.	Determi nation Identifier	Description of Change
1.	9 of 188 Section 1.24	9 of 188 Section 1.24	С	 Added "as required" to the Ventilation Exhaust Treatment System definition when describing that exhaust gases are passed through charcoal adsorbers.
2.	25 of 188 Section 5.4	25 of 188 Section 5.4	D	Changed footnote that describes FSAR update frequency from annual to biannual
3.	3. 42 of 188 42 of 188 C	С	 Added Reference 111 – Engineering Change (EC) #402667, Unit 1 OG Vent Stack Isol Valve Single Point Vulnerability Elimination – Install Valve Block on 10G035 	
			 Added Reference 112 – Engineering Change (EC) #402668, Unit 2 OG Vent Stack Isolation Valve Single Point Vulnerability Elimination – Install Valve Block on 20G035 	
4.	42 of 188	42 of 188	В	 Added Reference 113 – Engineering Change (EC) #624333, SGBD Overboard and Reduction
5.	47 of 188 Section 2.1.3.1	47 of 188 Section 2.1.3.1	В	 Changed first sentence of Condensate Polisher Sump description from "The condensate polisher sump receives wastewater from the condensate polisher system, which is normally non-radioactive but potentially contaminated" to "The condensate polisher sump receives wastewater and secondary process water from the condensate polisher system which is normally non-radioactive but potentially contaminated."
6.	53 of 188 Section 2.4.2.1	53 of 188 Section 2.4.2.1	С	 Added "as required" to the Ventilation Exhaust Treatment System description when describing that exhaust gases are passed through charcoal adsorbers.
7.	63 of 188 Figure 2-2	63 of 188 Figure 2-2	В	 Revised figure to add SGBD flow path that bypasses SGBD demineralizers and discharges water to CP sump
8.	63 of 188 Figure 2-2	63 of 188 Figure 2-2	А	Darkened some lines in flow diagram for consistence

Byron Station ODCM Revision 15 Change Summary Matrix

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Technical Changes (FSAR Footnote Update) - Determination D

9.	173 of 188 Table 6-1	173 of 188 Table 6-1	Α	 Changed Section 2.c "Indicators-Other" title to "Indicators" and definition from "At each airborne location listed in Section 1:" to "At all airborne indicator locations listed in Section 1" and removed BY-01, BY-04, BY-06, BY-21
10.	174 of 188 Table 6-1	174 of 188 Table 6-1	A	 Removed "Indicators-Other (cont'd)" and BY-22, BY-23, BY-24 Changed Section 2.d "Control" definition from "At each airborne location listed in Section 1:" to "At the control airborne location listed in Section 1" and removed BY-08
11.	185 of 188 Table 6-2	185 of 188 Table 6-2	Α	Added the following note to table title: "Dosimeters are also located at each air sampling station."
12.	186 of 188 Table 6-2	186 of 188 Table 6-2	Α	Added "(continued)" to Table 6-2 title
13.	187 of 188 Table 6-2	187 of 188 Table 6-2	Α	Added parentheses to "continued" in Table 6-2 title
14.	188 of 188 Table 6-2	188 of 188 Table 6-2	Α	Added parentheses to "continued" in Table 6-2 title