



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 23, 1991

Dr. Thomas E. Murley, Director
Office Of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
TAC Nos. 57198, 63250, 64029, 64056
Regulatory Guide 1.97 Compliance
NRC Docket Nos. 50-454/455 and 50-456/457

Reference: (a) February 27, 1987 K.A. Ainger letter
to H.R. Denton

(b) September 1, 1987 S.C. Hunsader letter
to T.E. Murley

(c) November 6, 1987 L. Olshan letter
to L.D. Butterfield

(d) December 28, 1987 S.C. Hunsader letter
to T.E. Murley

(e) May 5, 1988 L. Olshan letter
to H.E. Bliss

(f) July 27, 1988 S.C. Hunsader letter
to T.E. Murley

(g) May 19, 1989 S.P. Sands letter
to T.J. Kovach

(h) June 19, 1989 R.W. Cooper letter
to T.E. Murley

(i) July 24, 1989 R.W. Cooper letter
to Cordell Reed

(j) August 1, 1989 S.C. Hunsader letter
to T.E. Murley

Dear Dr. Murley:

Reference (a) provided Commonwealth Edison's (Edison) preliminary evaluation of the Byron and Braidwood instrumentation for compliance with Regulatory Guide 1.97, Revision 3. Reference (b) provided the results of Edison's final evaluation which were included as Attachments to that letter. Attachment A to reference (b) provided an update of Table 5-1. Attachment B to reference (b) provided the revised Human Factors Engineering Review. These supplemented the information provided in reference (a) and, together, constituted Edison's "Final Report" concerning Regulatory Guide 1.97 compliance for the Byron and Braidwood Stations.

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Reference (c) provided the results of the initial NRC review and evaluation of references (a) and (b). Edison's response to these was provided in reference (d). In reference (e), the NRC staff indicated that it had completed its review of Edison's submittals and had concluded that Edison's justification for the exceptions to Regulatory Guide 1.97, Revision 3 for some items was acceptable. However, for other items, additional justification was required.

In response to the NRC staff's review, reference (f) provided the additional justification or provided an appropriate response to the NRC staff's concerns. Subsequently, reference (g) was issued that reported final results of the NRC Staff review of Edison's submittals.

Reference (h) provided corrected pages to two (2) of Edison's submittals as identified during the NRC inspection at Braidwood during the week of June 12, 1989.

Reference (i) provided the results of the NRC inspection at Braidwood Station during the week of June 12, 1989 (456/457-89018) which included an inspection of the implementation of Reg Guide 1.97. Reference (j) provided justification for the continued use of the existing Spray Additive Tank Level indication and provided the implementation schedule, requested in Reference (g). In reference (g), all open items had been accepted by the NRC staff with the exception of the following:

- 1) Accumulator Tank Level and Pressure
- 2) Containment Sump Water Temperature
- 3) RHR Heat Exchanger Outlet Temperature
- 4) Quench Tank Temperature

Attachment A provides the status and actions taken for these items.

Please address any questions regarding this submittal to this office.

Very truly yours,



Allen R. Checca
Nuclear Licensing Administrator

Attachment

cc: R.M. Pulsifer-Project Manager, NRR
A.H. Hsia-Project Manager, NRR
W. Shafer-Chief, NRR
W. Kropp-Senior Resident Inspector-BY
S. Dupont-Senior Resident Inspector-BW

ATTACHMENT A
BYRON/BRAIDWOOD UNITS 1 AND 2
REGULATORY GUIDE 1.97 REV. 3 COMPLIANCE
STATUS AND ACTION SUMMARY

The NRC Staff issued the Byron/Braidwood Safety Evaluation Report (SER) regarding compliance to Regulatory Guide 1.97 Revision 3 on May 14, 1989. All justifications have been accepted by the NRC staff except for four (4) items. The following describes the status and the applicable implementation schedule for upgrading these items:

1. ACCUMULATOR TANK LEVEL AND PRESSURE

The NRC staff is continuing to review and determine on a generic basis, the need to replace this instrumentation. Since this is the case, no action is being taken at this time.

2. CONTAINMENT SUMP WATER TEMPERATURE

The NRC staff is continuing to review and determine on a generic basis, the need to replace this instrumentation. Since this is no case, no action is being taken at this time.

3. RHR HEAT EXCHANGER OUTLET TEMPERATURE

The existing RHR heat exchanger outlet temperature instrumentation has been replaced with environmentally qualified instrumentation.

This modification has been completed on Byron Unit 2 and Braidwood Unit 1.

Byron Unit 1 and Braidwood Unit 2 will be completed during the next refueling outages, which are scheduled for September, 1991.

4. QUENCH TANK TEMPERATURE

The pressurizer relief tank temperature instrumentation was replaced with environmentally qualified instrumentation that contains the appropriate temperature range scale:

This modification has been completed on Byron Units 1 and 2 and Braidwood Unit 1.

Braidwood Unit 2 will be completed during the next refueling outage, which is scheduled for September, 1991.