



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

June 29, 1990

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

Attn: Document Control Desk

Subject: Braidwood Station Units 1 and 2
Response to Generic Letter 90-04
NRC Docket Nos. 50-456 and 50-457

Reference: Generic Letter 90-04
Request for Information Concerning
Status of Implementation of
Generic Safety Issues (GSI)
Resolved with Imposition of
Requirements or Corrective Actions

Dear Dr. Murley:

Generic Letter 90-04 was issued as a part of the NRC's continuing effort to establish and maintain an accurate and validated implementation status for all significant staff imposed regulatory requirements or corrective actions. An important aspect of this effort is to ensure that the licensee and the NRC agree on the status of USI resolution implementation at each facility. This letter presents the Commonwealth Edison (Edison) response to Generic Letter 90-04, for Braidwood Station.

Braidwood Station has reviewed the guidance provided in the Generic Letter. The attached GSI table (Enclosure 1 from the generic letter) has been updated to reflect the current status of GSI implementation. The generic letter's guide for updating GSI status was utilized for this process. Accordingly, the Attachment to this letter provides the status of the efforts for Braidwood Station.

Please direct any questions regarding this response to this office.

Very truly yours,

S.C. Hunsader
S.C. Hunsader

Nuclear Licensing Administrator

/scl:ID56-1

Attachment

9007030101 900629
PDR ADOCK 05000456
P PDC

cc: A. Bert Davis-RIII
Resident Inspectors-BW
S. Sands-NRR

A016
1/1

Guidance For Completing Status Column in Enclosure 1

- (1) Provide a separate entry for each licensed reactor unit. If the information is identical for multiple units, so state.
- (2) If a GSI is not applicable to a unit(s), enter "NA".
- (3) If a GSI is applicable but no changes were necessary to implement the resolution, enter "NC". If the GSI implementation was completed prior to issuance of the operating license, enter "NC", as no post-licensing changes were necessary.
- (4) If a GSI is applicable, submittal of information and/or changes were necessary and such submittals were made or changes are complete, enter "C". Also identify the licensee's document(s) to the NRC which certified completion, and the document date(s).
- (5) If a GSI is applicable and changes are necessary but such changes are not yet fully implemented, enter "I" and the projected month and year of completion. Provide a brief explanation of the outstanding work in the "Comments" column.
- (6) If implementation guidance for a resolved GSI was issued recently and the licensee is still evaluating the appropriate response, enter "E" and the projected response date.
- (7) The "Comments" column may be used to explain any entry in the "Status" column.

FACILITY NAME: Braidwood Nuclear Station
 DOCKET NO.: 456 and 457
 LICENSEE: Commonwealth Edison Company

ATTACHMENT TO GENERIC LETTER 90-04 RESPONSE
STATUS OF LICENSEE IMPLEMENTATION OF GENERIC SAFETY ISSUES
RESOLVED WITH IMPOSITION OF REQUIREMENTS OR CORRECTIVE ACTIONS

<u>GSI/(PA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>COMMENTS</u>
40 (B065)	Safety Concerns Associated With Pipe Breaks in the BWR Scram System	All BWR's	N/A	
41 (B058)	BWR Scram Discharge Volume Systems	All BWR's	N/A	
43 (B107) (G.L. 88-14)	Reliability of Air Systems	All Plants	I	The Station is awaiting instructions from SMAD on investigative limits for particle size in air. Status update due 7/01/90 (456-104-88-01401). The supplemental response providing the results of engineering reviews will be provided by 8/04/90.
51 (L913) (G.L. 89-13)	Improving the Reliability of Open-Cycle Service Water Systems	All Plants	I	The following actions are pending for Generic Letter 89-13: -456-104-89-01301 - Track completion of sample program for clams at the Lake Screen House. Status update due 9/15/90. -456-104-89-01302 - Track two changes to biocide injection system via mods. Completion anticipated at the end of March, 1991. -456-104-89-01303 - Track procedure revision/development for flushing CC Heat Exchanger lines. Completion anticipated end of March, 1991. -456-104-89-01304 - Track mod for flushing fire protection crosstie lines. Anticipated completion is the end of the second or third refueling outage for each unit depending on the outage schedules.

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51 (1913) (G.L. 89-13)				-456-104-89-01305 - Develop procedure for flushing D.G. jacket water cooler/SX crosstie lines. Anticipated completion 12/01/90. -456-104-89-01306 - Mod to provide flushing of SX/AF crosstie lines. Anticipated completion is the end of second or third refueling outage for each unit. -456-104-89-01307 - Mod to provide flushing of SX return from AF lines 1/2SXE5A. Anticipated completion is the end of the second or third refueling outage for each unit. -456-104-89-01308 - Procedure revision to provide flushing of various coolers and heat exchangers. Anticipated completion is the end of second U-1 refueling outage. -456-104-89-01309 - Development of heat exchanger testing program for open cycle heat exchangers. Anticipated completion is the end of the second refueling outage for each unit. -456-104-89-01310 - Revision of erosion/corrosion program to include 5 high and low flow locations. Anticipated completion is the end of the second refueling outage for U-1.

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51 (L913) (G.L. 89-13)				456-104-89-01311 - Mod for installing corrosion monitoring equipment. Anticipated completion is the end of the second or third refueling outage for each unit. -456-104-89-01312 - Completion of Item 4 using the design review plan developed by NED and IMPELL. Anticipated completion is the end of the second refueling outage on U-1. -456-104-89-01313 - Review maintenance practices using checklists developed by NED, M/S & IMPELL. Anticipated completion is the end of the second refueling outage on U-1. -456-104-89-01314 - Review of training practices using checklists developed by NED, M/S & IMPELL. Anticipated completion is the end of the second refueling outage on U-1.
67.3.3 (A017) (G.L. 82-33)	Improved Accident Monitoring	All Plants	I	NUREG 0737 Supplement 1, Items I.D.1 & 2 are still open. Anticipated completion 12/05/90 (Ref. GL 82-33)
75 (B076) (G.L. 83-28)	Item 1.1 - Post-Trip Review (Program Description & Procedure)	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -06/05/85 Corporate response. Alexander to Denton (NL-85-0659) -07/11/85 NRC, Youngblood to Farrar accepting corporate response.

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75 (B085) (G.L. 83-28)	Item 1.2 - Post-Trip Review Data & Information Capability	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -04/04/86 Corporate supplemental response, Alexander to Denton (NL-86-0496) -05/05/86 NRC, Noonan to Farrar accepting corporate response.
75 (B077) (G.L. 83-28)	Item 2.1 - Equipment Classification & Vendor Interface (Reactor Trip System Components)	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -06/01/84 Corporate response, Barnes to Denton (NL-84-0254) 05/07/85 Corporate supplemental response, Alexander to Denton (NL-85-0498) -09/23/87 Corporate supplemental response, Hunsader to Murley (NL-87-1258) -03/09/88 NRC closed item in inspection reports 456/88006 & 457-88008 (TI2515/64RI) -03/26/90 NRC, Sands to Kovach accepting corporate response. Item is closed.
75 (B086) (G.L. 83-28)	Item 2.2.1 - Equipment Classification for Safety-Related Components	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -02/29/84 Corporate supplemental response, Barnes to Denton (NL-84-0254) -03/09/88 NRC reviewed & closed item in inspection reports 456-88006 & 457-88008 (TI 2515/64RI)

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75 (B086) (G.L. 83-28)				-04/21/89 Corporate supplemental response, Chrzanowski to Murley (NL-89-0403) -03/26/90 NRC, Sands to Kovach accepting corporate response. Item is closed.
75 (L003) (G.L. 83-28)	Item 2.2.2 - Vendor Interface for Safety-Related Components	All Plants	C*	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -02/29/84 Corporate supplemental response. Barnes to Denton (NL-84-0254) -06/01/84 Corporate supplemental response, Barnes to Denton (NL-84-0623) -05/07/85 Corporate response, Alexander to Denton (NL-85-0498) -03/09/88 NRC reviewed and closed item in inspection reports 456/88006 & 457/88008 (TI 2515/64R1) *Awaiting NRR approval
75 (B078) (G.L. 83-28) (Item 3.1.1)	Items 3.1.1 & 3.1.2 - Post Maintenance Testing (Reactor Trip System Components)	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -09/17/85 NRC, Youngblood to Farrar accepting corporate response. Item complete.

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75 (B078) (G.L. 83-28) (Item 3.1.2)			C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -09/17/85 NRC, Youngblood to Farrar accepting corporate response. Item complete.
75 (B079) (G.L. 83-28)	Item 3.1.3 - Post-Maintenance Testing Changes to Test Requirements (Reactor Trip System Components)	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -11/05/85 NRC, Youngblood to Farrar accepting corporate response. Item complete.
75 (B087) (G.L. 83-28) (Item 3.2.1)	Items 3.2.1 & 3.2.2 - Post-Maintenance Testing (All Other Safety-Related Components)	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -04/21/86 Corporate supplemental response Alexander to Denton (NL-86-0576) -06/25/86 NRC, Noonan to Farrar accepting corporate response. Item complete.
75 (B087) (G.L. 83-28) (Item 3.2.2)				-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -04/21/86 Corporate supplemental response, Alexander to Denton (NL-86-0576) -06/25/86 NRC, Noonan to Farrar accepting corporate response. Item complete.

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75 (B088) (G.L. 83-28)	Item 3.2.3 - Post-Maintenance Testing Changes to Test Requirements (All Other Safety-Related Components)	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -11/05/85 NRC, Youngblood to Farrar accepting corporate response. Item complete.
75 (B080) (G.L. 83-28)	Item 4.1 - Reactor Trip System Reliability (Vendor-Related Modifications)	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -09/17/85 NRC, Youngblood to Farrar accepting response. Item complete.
75 (B081) (G.L. 83-28) (Item 4.2.1)	Items 4.2.1 & 4.2.2 - Reactor Trip System Reliability - Maintenance Testing (Preventative Maintenance & Surveillance Program for Reactor Trip Breakers)	All PWR's	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -08/21/85 Corporate supplemental response, Alexander to Denton (NL 85-1050) -04/21/86 NRC, Noonan to Farrar accepting corporate response. Item complete.
75 (B081) (G.L. 83-28) (Item 4.2.2)			C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -08/21/85 Corporate supplemental response, Alexander to Denton (NL-85-1050) Braidwood Commitment 20-85-075 -04/21/86 NRC, Noonan to Farrar accepting corporate response. Item complete. -08/21/86 Braidwood Commitment 20-85-075 complete.

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75 (B082) (G.L. 83-28) (Item 4.3)	Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation of Shunt Trip Attachment for Westinghouse & B&W Plants)	All W & B&W Plants	C*	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -02/29/84 Corporate supplemental response Barnes to Denton (NL-84-0254) -02/05/85 Corporate supplemental response, Alexander to Denton (NL-85-0209) -03/13/85 NRC, Youngblood to Farrar accepting corporate response. -12/23/87 Corporate response to G. L. 85-09, Hunsader to Murley with Tech Spec changes. -03/09/88 NRC reviewed & closed item in inspection reports 456/88006 & 457/88008 (TI-2515/64R1) *Awaiting NRR approval
75 (B090) (G.L. 83-28)	Item 4.3 - Reactor Trip System Reliability - Tech Spec Changes (Automatic Actuation of Shunt Trip Attachment for Westinghouse & B&W Plants)	All W & B&W Plants	C*	See above comments for 75 (B082)
75 (B091) (G.L. 83-28)	Item 4.4 - Reactor Trip System Reliability (Improvements in Maintenance & Test Procedures for B&W Plants)	All B&W Plants	N/A	

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75 (B092) (G.L. 83-28)	Item 4.5.1 - Reactor Trip System Reliability Diverse Trip Features (System Functional Testing)	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -02/29/84 Corporate supplemental response, Barnes to Denton (NL-84-254) -09/17/85 NRC, Youngblood to Farrar accepting corporate response. Item complete.
75 (B093) (G.L. 83-28) (Item 4.5.2)	Items 4.5.2 & 4.5.3 - Reactor Trip System Reliability - Test Alterna- tives & Intervals (System Functional Testing)	All Plants	C	-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -02/29/84 Corporate supplemental response, Barnes to Denton (NL-84-0254) -01/23/87 NRC, Stevens to Farrar accepting corporate response. -09/23/87 Corporate supplemental response, Hunsader to Murley (NL-87-1258)
75 (B093) (G.L. 83-28) (Item 4.5.3)				-11/05/83 Corporate response, Barnes to Denton (NL-83-0520) -06/01/84 Corporate supplemental response, Barnes to Keppler (NL-84-0623) -06/12/85 Corporate supplemental response, Alexander to Denton (NL-85-0731)

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75 (B093) (G.L. 83-28) (Item 4.5.3)				-03/09/88 NRC reviewed & closed item in inspection reports 456/88006 & 457/88008 (TI 2515/64R1) -06/16/89 NRR letter, Olshan to Kovach accepting corporate response. Item complete.
86 (B084)	Long Range Plan for Dealing with Stress Corrosion Cracking in BWR Piping	All Plants	N/A	
93 (B098) (G.L. 88-03)	Steam Binding of Auxiliary Feedwater Pumps	All PWR's	C	-07/19/88 NRC, Olshan to Bliss accepting corporate response. Item complete. (No Corporate response in records) (G.L. 88-03)
99 (L817) (G.L. 88-17)	RCS/RHR Suction Line Valve Interlock on PWR's	All PWR's	I	-456-104-88-01708 - Design & installation of a second RCS level indication system. Anticipate completion at end of second U-1 refuel -457-104-88-01708 - Design & installation of a second RCS level indication system (U-2). Anticipate completion at end of second U-2 refueling outage. -456-104-88-01714 - Track evaluation of a main control room alarm with input from RH motor amps. Anticipated completion is 1/15/91.

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<u>GSII/(PA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>COMMENTS</u>
124	Auxiliary Feedwater System Reliability	ANO-1 & 2, Rancho Seco, Prairie Island 1 & 2, Crystal River-3, Ft. Calhoun	N/A	
A-13 (B017)	Snubber Operability Assurance - Hydraulic Snubbers	All Plants	N/C	Tech Specs 3/4.7.8 incorporates this item.
A-13 (B022)	Snubber Operability Assurance - Mechanical Snubbers	All Plants	N/C	Plant design & Tech Specs 3/4.7.8 incorporates this item.
A-16 (D012)	Steam Effects on BWR Core Spray Distribution	Oyster Creek & NMP-1	N/A	
A-35 (B023)	Adequacy of Offsite Power Systems	All Plants	N/C	Plant design already incorporates this item. Ref. SER & UFSAR.
B-10	Behavior of BWR Mark III Containments	All BWR Mark III Plants	N/A	
B-36	Develop Design, Testing and Maintenance Criteria for Atmosphere Cleanup System Air Filtration & Absorption Units for Engineered Safety Features Systems and for Normal Ventilation Systems	All Plants with OL Applications After 4/1/80	N/C	Plant design already incorporates this item. Ref. SER & UFSAR

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B-63 (B045)	Isolation of Low Pressure Systems Connected to the Reactor Coolant System Pressure Boundary.	All Plants	N/C	Plant design & Tech Specs 3/4.4.6 incorporates this item.