



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 9, 1994

Mr. William Russell, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Byron Station Units 1 and 2
Inservice Testing Program Plan for Pumps
and Valves Revision 13
NRC Docket Nos. 50-454 and 50-455

- References: (1) G. Wright letter to D. Farrar transmitting
Inspection Report 50-454/94002;50-455/94002
dated February 18, 1994
- (2) D. Farrar letter to J. Martin transmitting Response to
Notice of Violation dated March 18, 1994

Attached for your review is Revision 13 of Byron Station's Inservice Testing (IST) Program. The main purpose of this program revision is to incorporate the results of a combine Byron/Braidwood re-scoping effort, along with a few other minor changes. Reference 1, transmitted a Notice of Violation from the Nuclear Regulatory Agency (NRC) concerning the "scope" of the IST Program. In reference 2 Commonwealth Edison Company (ComEd) responded to that Notice of Violation and committed to complete a scope review for pumps and valves by June 30, 1994, and to submit a revised program by September 14, 1994.

Attachment A identifies all changes being made in Revision 13. Attachment B contains Revision 13 of Section 4 "Inservice Testing Program Plan for Valves," Section 4.4 "Notes," and Section 4.5 "Technical Approaches and Positions of Byron Station's Inservice Inspection Program."

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Mr. Russell

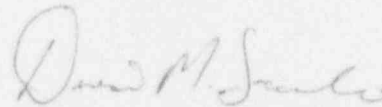
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September 9, 1994

ComEd requests that the NRC review and approve relief requests VR-26, "Fire Protection Inside Containment Isolation Valves" and VR-27 "Charging and Volume Control Loop Fill Check Valves" on an expedited manner. Approval of these relief request is necessary, to avoid unnecessary testing of the valves every 3 months or during a cold shutdown condition. Testing of the Unit 1 valves will be conducted during the current refueling outage. Testing of the Unit 2 valves will be completed during the upcoming Unit 2 refueling outage, which is currently scheduled for February 1995.

Please address any questions you may have regarding this matter to Denise Saccomando at (708) 663-6484.

Sincerely,



Denise M. Saccomando
Nuclear Licensing Administrator

Attachments

cc: G. Dick, Byron Project Manager - NRR
H. Peterson, Senior Resident Inspector - Byron
J. B. Martin, Regional Administrator - Region III
Office of Nuclear Facility Safety - IDNS

ATTACHMENT A

Summary of Changes for Revision 13 of the Inservice Testing Program Plan for Valves

Section 4.0 - Table of Contents

A. Scope Review Additions/Revisions:

1. Added Cold Shutdown justifications (VC-1, VC-2, VC-3, and VC-4) to section 4.4 for new valves added to the program.
2. Revised wording of Technical Approach and Position VA-05 to incorporate the additional CC manual valves added in this revision.
3. Added relief request VP-26 and VR-27 requesting refueling outage frequency for testing some of the newly added valves.

Section 4.3 - Program Tables

A. Scope Review Additions/Revisions:

1. 1/2CC9459A; 1/2CC9458; 1/2CC9467A,C: Added these manual valves to the program. They will be exercise tested (listed as "St") in the Open and Closed direction during U-2 Cold Shutdowns (VA-05).
2. 1/2CV128: Added these valves (AOVs) to the program. They will be stroked/fail-safe tested Quarterly (OP) and a Position Indication test will be performed on a Refueling Outage basis (RR).
3. 1/2CV459; 1/2CV460; 1/2CV8149A,B,C : Added these valves (AOVs) to the program. They will be stroked/fail-safe tested on a Cold Shutdown basis per VC-4 and the Position Indication tests will be performed on a Refueling Outage Basis.
4. 1/2CV8153A/B: Added these valves (AOVs) to the program. They will be stroked/fail-safe tested quarterly (OP) and a Position Indication test will be performed on a Refueling Outage basis.
5. 1/2CV8348: Added these check valves to the program. They will be backflow tested during Refueling Outages per relief request VR-27.
6. 1/2CV8355A-D: Added these MOVs to the program. They will be stroked at Cold Shutdown per VC-2 and a Position Indication test will be performed on a Refueling Outage basis.
7. 1/2CV8368A-D: Added these check valves to the program. They will be backflow tested (Bt) at Cold Shutdown per VC-2.
8. 1/2FP345: Added these Check valves to the program. They will be backflow tested during Refueling Outages per VR-26.
9. OOG059; OOG061; OOG062; OOG063; OOG064; OOG065: Added these MOVs to the program. They will be stroke timed on a Quarterly (OP) basis and Position Indication tested on a Refueling Outage basis.
10. 1SD054A; 1/2SD054B; 1SD054C; 1/2SD054D; 1SD054E; 1/2SD054F; 1SD054G; 1/2SD054H: Added these AOVs to the program. They will be stroke timed and fail-safe tested on a Cold Shutdown Basis per VC-3.

11. 1/2SI8808A-D: Added these MOVs to the program. They will be stroke timed on a Cold Shutdown basis per VC-1 and Position Indication tested on a Refueling Outage basis.
12. 1/2SX005: Added these MOVs to the program. They will be stroke timed on a Quarterly (OP) basis and Position Indication Tested on a Refueling Outage basis.
13. OSX127A/B: Added these Check Valves to the program. They will be backflow (Bt) and full flow (Ct) tested on a quarterly (OP) basis.
14. OSX143A/B: Added these Check Valves to the program. They will be backflow (Bt) tested on a Quarterly basis (OP).
15. OSX162A-D: Added these MOVs to the program. They will be stroke timed on a quarterly basis (OP) and Position Indication tested on a Refueling basis.
16. OSX163A-H: Added these MOVs to the program. They will be stroke timed on a quarterly basis (OP) and Position Indication tested on a Refueling basis.
17. OWO002A,B: Added these Check Valves to the program. They will be full stroke tested (Ct) on a Quarterly (OP) basis.

B. Administrative/Typographical Errors:

1. 1/2SI8806: Removed "O" under "Stroke Direction" column. IST Program tested valve closed, but Rev. 11 contained Open stroke time test only. Byron conservatively just added the Closed direction in Rev 12 and investigated "O" direction. Scope Review completion verified that the Open stroke time test is not required.
2. 1/2SI8926: Under "Test Mode" column, change "CS" to "RR" corresponding to the Full Stroke (Ct) Test (Approved VR-6 verifies this typo in the program)
3. 1/2WM191: Under "Test Method" column, add "BT". This is the same test as the listed LT test. For completeness, however, the BT test should be listed.

C. VR-12 Updates (revised relief granted per GL 89-04, Position 6):

1. 1/2CV8114: Added "VR-12" reference under "Relief Request" column due to the addition of of these valves to Relief Request VR-12 for the quick "open" stroke time of these valves.
2. 1/2CV8116: Added "VR-12" reference under "Relief Request" column due to the addition of these valves to to Relief Request VR-12 for the quick "open" stroke time of these valves.
3. 1/2PS9354B: Added "VR-12" reference under "Relief Request" column due to the addition of the 2PS9354B valve to Relief Request VR-12..
4. 1/2PS9357A: Added "VR-12" reference under "Relief Request" column due to the addition of the 1PS9357A valve to Relief Request VR-12.
5. 1/2PS9357B: Added "VR-12" reference under "Relief Request" column due to the addition of the 1PS9357B valve to Relief Request VR-12.

Section 4.4 - Valve Notes / Cold Shutdown Justifications

A. Scope Review Additions/Revisions:

1. Added VC-1 Cold Shutdown Justification for the safety injection accumulator discharge motor operated valves (1/2SI8808A-D) for the closed direction.
2. Added VC-2 Cold Shutdown Justification for the RCP Seal Injection Inlet Motor Operated Valves (1/2CV8355A-D) and Check Valves (1/2CV8368A-D).
3. Added VC-3 Cold Shutdown Justification for the Steam Generator blowdown AOV flow control / high energy line break (HELB) Isolation valves (1SD054A, 1/2SD054B, 1SD054C, 1/2SD054D, 1SD054E, 1/2SD054F, 1SD054G, 1/2SD054H).
4. Added VC-4 Cold Shutdown Justification for the following letdown AOV isolation valves: 1/2CV459, 1/2CV460, and 1/2CV8149A-C.

B. Other:

1. Revised Note 30 to indicate that the backflow test for the AF014A-H valves will be performed during Cold Shutdowns as recommended by region III Inspectors in addition to what is done shiftly during Operator Rounds. This will allow IST documentation every Cold Shutdown for this test.

Section 4.5 - Valve Technical Approaches and Positions

A. Scope Review Additions/Revisions:

1. Revised VA-05 to incorporate the new CC manual valves added in this revision (1/2CC9458, 1/2CC9459A, 1/2CC9467A, ?). VA-05 now justifies a U-2 Cold Shutdown frequency for all of the associated CC manual valves in the IST Program.

B. Administrative Revisions:

1. Revised VA-02 to more clearly state Byron's position on fail safe testing. Words associated with MOV valves were removed from this position.

Section 4.6 - Valve Relief Requests

A. Scope Review Additions/Revisions:

1. New Relief Request VR-26 for the 1/2FP345 Fire Protection inside Isolation Valves closure test. This valve is being added in this revision due to the scope review determination that they satisfy an IST function in the closed direction. This relief request is pending and Byron requests an expedited review and approval.
2. New Relief Request VR-27 for the 1/2CV8348 Charging and Volume Control Loop Fill Check Valves closure test. This valve is being added in this revision due to the scope review determination that they satisfy an IST function in the closed direction. This relief request is pending and Byron requests an expedited review and approval.

B. VR-12 Updates:

1. Added 1/2CV8114 and 1/2CV8116 (open direction stroke times only) to relief request VR-12 along with the 1PS9357A,B, 2PS9354B, and 2RE9170 valves due to their quick stroke times. This revised relief request is granted per GL 89-04, Position 6.

ATTACHMENT B