



Commonwealth Edison
Braidwood Nuclear Power Station
Route #1, Box 84
Braidwood, Illinois 60407
Telephone 815/458-2801

March 15, 1994
SVP/94-017

Mr. John B. Martin
Regional Administrator
U.S Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Dear Mr. Martin:

Subject: Braidwood Station Unit 2
Request for Notice of Enforcement Discretion from
Technical Specification 3.6.1.1
NRC Docket Number 50-457

The purpose of this letter is to document the results of a teleconference between Commonwealth Edison Company (CECo) and the Nuclear Regulatory Commission (NRC) staff on March 14, 1994, in which CECo requested issuance of a Notice of Enforcement Discretion (NOED) from Technical Specification 3.6.1.1 for Braidwood Station Unit 2.

On March 14, 1994, at 1350 hours Braidwood Unit 2 entered the Technical Specification 3.6.1.1 Limiting Condition for Operation Action Statement, as a result of the discovery of six, uncapped construction concrete pouring vents which have the potential to connect the containment atmosphere with the outside environment. These vents are filled with concrete, but are not capped as required by American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III, Subsection NE for Containment Vessels.

The basis of the request for Enforcement Discretion is provided in Attachment 1 and includes:

- The Technical Specification that will be violated;
- The circumstances surrounding the condition, including the need for prompt action;
- The safety basis for the request that enforcement discretion be exercised, including an evaluation of the safety significance and potential consequences of the proposed course of action;
- Any proposed compensatory measure(s);
- Justification for the duration of the request;

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Mr. Martin

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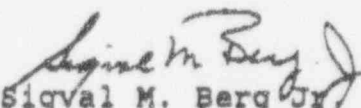
March 15, 1994

- The basis for the conclusion that the request will not have a potential adverse impact on the public health and safety and that a significant safety hazard is not involved; and
- The basis for the conclusion that the request will not involve adverse consequences to the environment.

CECo requested that Enforcement Discretion be in effect until March 18, 1994, at 1350 hours, at which time if containment integrity is not restored, Unit 2 will be shutdown in accordance with Technical Specification 3.6.1.1. A Notice of Enforcement Discretion was verbally approved by Region III at 1540 hours (CST) on March 14, 1994.

This request for Enforcement Discretion has been reviewed and approved by the Braidwood On-Site Review Committee, in accordance with station procedures.

CECo sincerely appreciates the NRC staff's effort and participation in the review of this request. Please direct any questions or comments to Al Haeger (815)458-2801, extension 2702.


Sigval M. Berg Jr.
Site Vice-President
Braidwood Station

Attachment

cc: R. Assa, Braidwood Project Manager-NRR
S. DuPont, Senior Resident Inspector-Braidwood
B. Clayton, Branch Chief-Region III
NRC Document Control Desk

**ATTACHMENT 1
REQUEST FOR ENFORCEMENT DISCRETION
BRAIDWOOD UNIT 2
MARCH 14, 1994**

Commonwealth Edison Company is requesting enforcement discretion for Braidwood Unit 2 from Technical Specification 3.6.1.1.

1. TECHNICAL SPECIFICATION OR LICENSING CONDITION THAT WILL BE VIOLATED:

At 1350 hours on March 14, 1994, Braidwood Unit 2 entered the Technical Specification 3.6.1.1 Limiting Condition for Operation Action Statement as a result of the discovery of six, uncapped six-inch diameter construction concrete pouring vents which have the potential to connect the containment atmosphere with the outside environment. These vents are filled with concrete, but are not capped as required by the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III, Subsection NE for Containment Vessels.

Technical Specification 3.6.1.1 states that without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

2. CIRCUMSTANCES SURROUNDING THE SITUATION:

At approximately 1830 hours on Saturday March 12, 1994, a containment entry was made on Braidwood Unit 1 in an attempt to determine the cause of excessive leakage discovered during the Integrated Leak Rate Test (ILRT). During this entry six, uncapped, concrete filled, six-inch diameter construction concrete pouring vents were discovered. These vents should have been capped during construction in accordance with ASME Boiler and Pressure Vessel Code, Section III, Subsection NE for Containment Vessels. These uncapped, concrete filled, construction concrete pouring vent lines have the potential to connect the containment atmosphere with the outside environment in the vicinity of the containment emergency escape hatch. On March 14, 1994, at 1320 hours a containment entry was made on Braidwood Unit 2 and it was discovered that the Unit 2 construction concrete pouring vent lines were also uncapped, but concrete filled.

This situation requires enforcement discretion in order to avoid the forced shutdown of Braidwood Unit 2. The situation could not have been avoided since these uncapped, concrete filled, construction concrete pouring vent lines were discovered just prior to entering the Technical Specification 3.6.1.1 Limiting Condition for Operation Action Statement.

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3. EVALUATION OF THE SAFETY SIGNIFICANCE AND CONSEQUENCES:

Primary CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the safety analyses. This restriction, in conjunction with the leakage rate limitation, will limit the Site Boundary radiation doses to within the dose guideline values of Title 10, Code of Federal Regulations, Part 100 (10 CFR 100) during accident conditions.

The requested enforcement discretion from Technical Specification 3.6.1.1 due to a degradation of Primary CONTAINMENT INTEGRITY from uncapped, concrete filled, construction concrete pouring vent lines will not affect the ability of the containment to limit release of radioactive material from the containment atmosphere to values assumed in the safety analyses. During the construction of Braidwood Unit 2, a structural integrity test (SIT) was performed to evaluate the integrity of the containment. Pressure loading during this test was the major contributor compared to temperature loading, seismic loading, dead loads, and other loads. Since the SIT, several ILRTs have been successfully performed on Braidwood Unit 2 indicating that the degradation of the concrete filling in the construction concrete pouring vent lines due to age and/or thermal cycles has been minimal. Additionally, during normal operation, Braidwood Unit 2 continues to experience expected containment pressure increases. These facts indicate the continued ability of the Braidwood Unit 2 containment to perform its design function.

4. COMPENSATORY ACTIONS:

The availability of containment spray and the reactor containment fan coolers will be maximized for Braidwood Unit 2 during the duration of this enforcement discretion. These uncapped, concrete filled, construction concrete pouring vent lines will be repaired and tested by 1350 hours on Friday March 18, 1994. If repairs are not completed by this time, Braidwood Unit 2 will be shutdown in accordance with Technical Specification 3.6.1.1.

5. JUSTIFICATION FOR THE DURATION OF THE REQUEST:

Braidwood requests an extension of the allowed outage time to 96 hours in order to prepare the necessary work packages, prepare the area, fabricate and install the missing pipe caps, perform nondestructive examination of the welds, pressure test the caps, and close out all associated paperwork. This 96 hour period will expire at 1350 hours on Friday March 18, 1994.

6. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION:

Commonwealth Edison has evaluated the proposed enforcement discretion and determined that it involves no significant hazards considerations. According to 10 CFR 50.92(c), the proposed enforcement discretion involves no significant hazards considerations if operation of the facility in accordance with the enforcement discretion would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

- A. The proposed enforcement discretion does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The uncapped, concrete filled, construction concrete pouring vent lines are not considered as precursors to any accident previously analyzed in the Updated Final Safety Analysis Report (UFSAR). Primary CONTAINMENT INTEGRITY coupled with containment leakage rate limitations ensures that the consequences of a Loss of Coolant Accident (LOCA) remain within the dose guideline values of 10 CFR 100. The uncapped, concrete filled, construction concrete pouring vent lines have not resulted in leakage rates in excess of those assumed in the LOCA analyses as demonstrated by successful completion of past ILRTs for Braidwood Unit 2. Therefore, granting of this enforcement discretion will not result in a significant increase in the probability or consequences of an accident previously evaluated in the UFSAR.

- B. The proposed enforcement discretion does not create the possibility of a new or different kind of accident from any accident previously evaluated.

These uncapped, concrete filled, construction concrete pouring vent lines could potentially contribute to containment leakage during an event. The LOCA analyses consider the effects of containment leakage on off-site dose. Therefore, granting of this enforcement discretion will not create the possibility of a different kind of accident from any previously evaluated.

- C. The proposed enforcement discretion does not involve a significant reduction in a margin of safety.

Previous ILRTs on Braidwood Unit 2 have demonstrated acceptable results for containment leakage. Inspection of the concrete filling of the uncapped, concrete filled, construction concrete pouring vent lines has shown no visible signs of degradation. Therefore the existing leakage from the Braidwood Unit 2 containment, including the effects of the uncapped, concrete filled, construction pouring vent lines, is bounded by the leakage rates assumed in the accident analyses. Thus, granting of this enforcement discretion will not result in a significant reduction in the margin of safety.

Therefore, based on the above evaluation, Commonwealth Edison has concluded that this request for enforcement discretion does not involve a significant hazards consideration.

7. ENVIRONMENTAL ASSESSMENT:

Commonwealth Edison has evaluated the proposed enforcement discretion against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed enforcement discretion meets the criteria for categorical exclusion as provided for in 10 CFR 51.22(c)(9). This determination is based on the fact that this request is being proposed as enforcement discretion to a license issued pursuant to 10 CFR 50, and that the change requested involves extension of the allowed outage time of components located within the restricted area, and the change involves no significant hazards considerations. In addition, there is no change in the effluents that may be released offsite. There is no significant increase in individual or cumulative occupational radiation exposure.

8. APPROVAL BY ONSITE REVIEW:

This request has been reviewed and approved by the Braidwood On-Site Review Committee in accordance with station procedures.