

May 11, 1995

Office of Nuclear Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

**ComEd**

Attn: Document Control Desk

Subject: Clarification of Information Regarding Braidwood  
Stations Request to Use American Society of Mechanical  
Engineers Code Case N-514 in the Determination of Low  
Temperature Overpressure Protection System Setpoint

Braidwood Station Units 1 and 2  
NRC Docket Numbers 50-456/457

- References:
1. D. Saccomando letter to NRC dated  
November 30, 1994, Transmitting Request to  
Use ASME Code Case N-514
  2. D. Saccomando letter to NRC dated  
December 16, 1995, transmitting Technical  
Specification Amendment Request for Nominal  
PORV Pressure Relief Setpoint Versus RCS  
Temperature for the Cold Overpressure  
Protection System
  3. Teleconference dated May 2 between  
Commonwealth Edison Company and the Nuclear  
Regulatory Commission Regarding the December  
16, 1995, Technical Specification Submittal

During the Reference Teleconference it was noted that  
Commonwealth Edison Company (ComEd) needed to clarify that it is  
requesting an exemption request per 10CFR50.12 to use American  
Society of Mechanical Engineers (ASME) Section XI Code Case N-  
514, "Low Temperature Overpressure Protection Section XI,  
Division 1," in the determination of Low Temperature Overpressure  
Protection System (LTOPS) Setpoints for Braidwood Nuclear Station  
Units 1 and 2.

10CFR50.12(a)(2)(iii) allows for the Commission to consider  
granting an exemption under special circumstances; specifically,  
if compliance would result in undue hardship. As stated in  
Reference letter 1,

"Compliance with the current requirements for determination  
of LTOPS setpoints included in 10CFR50 Appendix G results in  
hardships for Braidwood Station without a concurrent  
increase in the level of quality and safety. Application of  
the current LTOPS setpoint determination method reduces  
operating flexibility by reducing the margin between the  
maximum allowed Reactor Coolant System (RCS) pressure and

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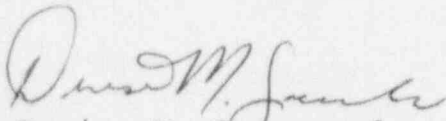
May 11, 1995

the minimum RCS pressure for Reactor Coolant Pump (RCP) operation with no concurrent increase in protection against non-ductile failure of the Reactor Pressure Vessel. The current methodology also increases the likelihood of LTOPS actuation at lower setpoints, and reduces the amount of separation of the setpoints for the Power Operated Relief Valves (PORV) used in the LTOPS system. This endangers the RCP seals as actuation of LTOPS at setpoints determined by the current methodology may cause RCS pressure to drop below the minimum needed to maintain proper RCP seal differential pressure."

Approval of this request to use Code Case N-514 in the determination of LTOPS setpoints is necessary to allow Braidwood Station to obtain approval of new LTOPS Technical Specification curves which was submitted in Reference 2.

If you have any questions regarding this correspondence, please contact this office.

Sincerely,



Denise M. Saccomando  
Nuclear Licensing Administrator

cc: R. Assa, Braidwood Project Manager-NRR  
S. Dupont, Senior Resident Inspector-Braidwood  
J. Martin, Regional Administrator-RIII  
Office of Nuclear Safety-IDNS