



STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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TERRY R. LASH
DIRECTOR

July 28, 1989

50-454/455
50-456/457

Mr. S. Sands, Project Manager
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC. 20555

In Response Please Refer To: 89-78

Dear Mr. Sands:

The Illinois Department of Nuclear Safety is concerned with the attached amendment request submitted by Commonwealth Edison Company on March 17, 1989. This amendment is applicable to Byron Units 1 and 2, and to Braidwood Units 1 and 2. If approved, this amendment would delete the requirement for surveillance of the emergency core cooling system discharge lines at these units when they are in normal operating mode (MODE 1). The requirement at present is that surveillance is to take place every 31 days inclusive of the normal operating mode.

Inasmuch as these units are likely to remain in normal operation mode for extended periods, the effect of this amendment will be to substantially reduce surveillance venting of the emergency core cooling systems at these plants. A failure of the emergency core cooling systems would significantly increase the consequences of a loss of coolant accident. Our concern is that reducing the frequency of surveillance will increase the likelihood of such a failure going undetected. We are not convinced that the ALARA considerations expressed by Commonwealth Edison Company are of sufficient import to justify the reduction in the frequency of surveillance. We would appreciate your taking our views into account in your consideration of this matter.

Sincerely,

Mike Parker, Chief
Division of Engineering

MP:dsk

Attachments

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