



Commonwealth Edison
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May 7, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Braidwood and Byron Stations
Supplement Response to Generic Letter
No. 83-28, "Required Actions Based on
Generic Implications of Salem ATWS Events"
NRC Docket Nos. 50-454/455 and 456/457

References (a): Generic Letter No. 83-28 D. G. Eisenhower
letter to all OLS and CPS dated July 8, 1983
(NL-83-0003)

(b): B. J. Youngblood to D. L. Farrar letter dated
March 12, 1985

Dear Denton:

Reference (b) contained a request for additional
information pertaining to Items 2.1, 2.2.2, 4.5.2 and 4.5.3 of
Generic Letter 83-28. Attached are the responses for Byron and
Braidwood Stations for items 2.1, 2.2.2, and 4.5.2. Item 4.5.3 will
be responded to at a later date.

Please address any questions that you or your staff may
have concerning our response to Generic Letter No. 83-28 to this
office.

Respectfully,

G. L. Alexander
Nuclear Licensing Administrator

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Attachment

cc: US NRC, Document Control Desk
Washington, DC 20555

L. N. Olshan - LBI
J. Stevens - NRR
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PART I
BRYON STATION

Item 2.1

Applicant needs to submit detailed information describing its vendor interface program for reactor trip system components. Information supplied should state how the program assures that vendor technical information is kept complete, current, and controlled throughout the life of the plant and should also indicate how the program will be implemented at Byron/Braidwood.

Response

Byron Station has implemented Nuclear Stations Division Directive MO-2, Control of Vendor Equipment Technical Information. The directive is reflected in Station Administrative Procedures BAP 1340-14 and BAP 1340-T17. The referenced procedures describe the methodology for vendor manual receipt, control, and use which includes processing manual revisions and documenting the engineering review of technical manuals.

Vendor revision and new materials are initially reviewed by the Technical Staff Engineer responsible for the system affected. Following this review, maintenance and operating personnel review the information for impact on approved station procedures. Finally, all controlled copies of the affected manual are updated to reflect the revision. Controlled copies of vendor manuals may be compared to the master copy of the manual to verify accuracy and completeness. The master copy of the manual is filed in plant records vault and is not available for general checkout.

In the case of the reactor trip system components, Westinghouse requires signed receipt acknowledgements for documentation sent to Commonwealth Edison. Assuming a change to the technical information is required as a result of the modification, concurrence from Westinghouse shall be requested.

Copies of the station procedure and the Nuclear Stations Directive are attached to the end of this section.

Item 2.2.2

Applicant needs to present its evaluation of the NUTAC program and describe how it will be implemented at Byron/Braidwood. The staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility. Accordingly the applicant will need to supplement its response to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet each element of the item 2.2.2 concern.

Response

CECo's representative in the NUTAC program was from Nuclear Stations Division, a Corporate level organization. To implement the Vendor Equipment Technical Information Program at each nuclear station, NSD issued a directive, NSDD-M02, based on the NUTAC program and INPO Good Practice MA 304. The directive defines the minimum requirements for implementation of the program and serves as our corporate statement on the control of vendor information. A copy is attached at the end of Part I for your review.

Item 4.5.2

Applicant needs to describe design modifications that will permit on-line test of the RTS and provide an implementation schedule.

Response

The station was designed with on-line testing capabilities. Byron Station currently conducts on-line testing of the Reactor Trip Breakers on a bimonthly, staggered basis in Operating Surveillances 1BOS 3.1.1-10 and 1 BOS 3.1.1-11. The testing verifies proper operation of the shunt and undervoltage trip actuations on both trains of the reactor trip system. Copies of the procedures are attached to the end of this section.

The shunt trip modification will be installed per a Westinghouse Field Change Notice (CAEM 10807). Upon completion of the modification installation (1st refueling), surveillance procedures will be updated to include testing from the auto shunt trip panel.