



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

November 21, 1991

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Braidwood Station Units 1 and 2
NED-EQ Response to NRC Inspection Unresolved Item
50-456/89018-04 and 50-457/89018-04.

Reference: NED-EQ Report, Environmental Qualification of Okonite Tape Splice
(T-95/No. 35) Under Local Submergence for Power and Control
Applications.

During the follow-up inspection at the Braidwood Station (Unresolved Item 50-456/89018-04 and 50-457/89018-04), a concern regarding the environmental qualification of the Okonite tape splice (T-95/No. 35) under "local submergence" due to a line break accident was raised by the NRC. These Okonite tapes are used to terminate splice cables in junction and pull boxes. The concern was that the splices in the junction and pull boxes would, in the event of an accident, become submerged, and under such a condition may not function.

Commonwealth Edison Company (CECo) has completed an evaluation of the tests performed on Okonite tape splices under "local submergence". This study and conclusion are documented in the attached report. After analyzing the circuit application of Okonite splices, reviewing the test results and material analysis of Okonite tape splices, CECO has concluded that the low voltage power and control Okonite tape splices are environmental qualified for a "local submergence" condition due to a postulated line break to 10CFR50.49, NUREG 0588 Category 1 and IEEE 323-1974 requirements.

Please direct any questions concerning this submittal to this office.

Respectfully

Terence W. Simpkin
T.W. Simpkin
Nuclear Licensing Administrator

cc: R. Elliott - NRR
B. Clayton - RIII
S. DuPont - Braidwood SRI

9212080204 921121
PDR ADDCK 05000456
G PDR

ZNLD/1337/12

ADD: ROB ELLIOTT

W. Encl

DF01