



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

May 29, 1985

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

Subject: Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Initial Test Program
NRC Docket Nos. 50-454/455 and 50-456/457

Dear Mr. Denton:

This letter provides a clarification to our implementation of the initial test program guidelines contained in Regulatory Guide 1.68, Revision 2. Appendix A.5.1 of this regulatory guide indicates that the capability of the neutron flux instrumentation to detect a control rod misalignment should be demonstrated at 50% power and 100% power. This demonstration has been successfully performed on Byron Unit 1 at the 50% power level. The information in the enclosure provides justification for not performing this test at the 100% power level. Appendix A1.68 of the Byron/Braidwood FSAR will be revised in the next amendment to include the enclosed clarification.

Please direct any questions concerning this matter to this office.

One signed original and fifteen copies of this letter and enclosure are provided for NRC review.

Very truly yours,

K. A. Ainger
Nuclear Licensing Administrator

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Enclosure

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ENCLOSURE

Appendix A.5.i states "Demonstrate capability and/or sensitivity, as appropriate for the facility design of incore and excore neutron flux instrumentation, to detect a control rod misalignment equal to or less than the technical specification limits. (50%, 100%) (PWR)"

An evaluation of instrumentation response to a misaligned control rod will be performed during the flux asymmetry startup test conducted at 50% power. However, in accordance with a recommendation from the NSSS vendor, the Applicant does not intend to perform this testing at 100% power. Although the technical specifications provide relief from the requirements of certain technical specifications when performing physics tests below 85% power, creating a control rod misalignment at 100% power does not fall within this special test exclusion. As a result, technical specification limits regarding rod insertion and/or peaking factors may be exceeded.

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