



Commonwealth Edison

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

June 28, 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
Elimination of Postulated Pipe
Breaks in the RCS Primary Loops
NRC Docket Nos. 50-454, 50-455,
50-456 and 50-457

Reference (a): September 17, 1984 letter from E. D.
Swartz to H. R. Denton.

Dear Mr. Denton:

Reference (a) provided the technical justification for applying the leak-before-break concept to the reactor coolant system (RCS) primary loops at Byron and Braidwood stations. This concept eliminates postulated pipe breaks from the design basis of the RCS primary loops and is the basis for the partial exemption from General Design Criterion (GDC) 4 that was requested in reference (a). In addition to the technical information provided in reference (a), a value impact analysis has been performed to support granting the partial exemption.

Enclosed is the value impact analysis, in terms of man-rem exposure, for implementing the leak-before-break concept to eliminate pipe whip restraints and jet deflectors on the Byron and Braidwood RCS primary loops. Although Byron Unit 1 is operating in compliance with the requirements of GDC-4, our value impact analysis demonstrates a man-rem savings over this unit's 40-year life by removing the installed pipe whip restraints and jet deflectors at the earliest opportunity.

It is our understanding that the NRC is now pursuing a change to GDC-4 through the rulemaking process. Therefore, Commonwealth Edison requests a partial exemption from GDC-4 be granted for the first two fuel cycles of each Byron and Braidwood unit.

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H. R. Denton

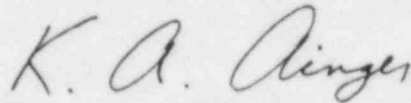
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June 23, 1985

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

Please direct any questions regarding this matter to this office.

Very truly yours,



K. A. Ainger
Nuclear Licensing Administrator

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Enclosure

cc: Byron Resident Inspector
Braidwood Resident Inspector

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