

February 11, 1997

Ms. Irene M. Johnson, Acting Manager  
Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING FIRST 10 YEAR  
INSERVICE INSPECTION PROGRAM - BRAIDWOOD STATION (TAC NOS. M97134  
AND M97135)

Dear Ms. Johnson:

On October 8, 1996, Commonwealth Edison Company (ComEd) submitted Revision 4 of its first 10 year Inservice Inspection Program and associated relief requests for Braidwood Station, Units 1 and 2. Subsequent to the submittal ComEd requested expedited review for Relief Request NR-29. During our review of relief request NR-29, we have identified the need for further information as discussed in the enclosed request for additional information (RAI). Please provide your response to the RAI so that we may continue to review your submittal.

In addition, in order to expedite the review process, please send a copy of the RAI response to our contractor, Idaho National Engineering Laboratory (INEL), at the following address:

Mr. Michael T. Anderson  
INEL Research Center  
2151 North Boulevard  
P.O. Box 1625  
Idaho Falls, Idaho 83415-2209

Sincerely,

/s/  
George F. Dick, Jr., Project Manager  
Project Directorate III-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-456 and STN 50-457

Enclosure: RAI

cc w/encl: See next page

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I. Johnson  
Commonwealth Edison Company

cc:

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U.S. Nuclear Regulatory Commission  
Braidwood Resident Inspectors Office  
Rural Route #1, Box 79  
Braceville, Illinois 60407

Braidwood Station  
Unit Nos. 1 and 2

Mr. Ron Stephens  
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and Disaster Agency  
110 East Adams Street  
Springfield, Illinois 62706

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Braidwood Station Manager  
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Braceville, Illinois 60407

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U.S. Environmental Protection Agency  
77 W. Jackson Blvd.  
Chicago, Illinois 60604-3590

Mr. H. G. Stanley  
Site Vice President  
Braidwood Station  
Commonwealth Edison Company  
RR #1, Box 84  
Braceville, IL 60407

REQUEST FOR ADDITIONAL INFORMATION  
FIRST TEN YEAR INSERVICE INSPECTION INTERVAL  
COMMONWEALTH EDISON COMPANY  
BRAIDWOOD STATION, UNITS 1 AND 2  
DOCKET NOS. STN 50-456 AND STN 50-457

BACKGROUND

The NRC is responsible for the review and disposition of licensees' requests relating to inservice inspection (ISI) requirements contained in the Code of Federal Regulations (CFR) 10 CFR 50.55a, and Section XI of the American Society of Mechanical Engineers' (ASME) Boiler and Pressure Vessel Code. When submitting such requests, licensees are required to provide both a regulatory basis (by citing the appropriate section of 10 CFR 50.55a) and a technical discussion supporting the request. This information is used in evaluating the request.

The Staff has determined that licensees must state the specific paragraph of the Regulations under which each proposed alternative or request for relief is submitted, as discussed below.

A licensee may propose an alternative to CFR or Code requirements in accordance with 10 CFR 50.55a(a)(3)(i) or 10 CFR 50.55a(a)(3)(ii). When submitting a proposed alternative, the licensee must specify the appropriate regulatory basis. Under 10 CFR 50.55a(a)(3)(i), the proposed alternative must be shown to provide an acceptable level of quality and safety, i.e., essentially be equivalent to the original requirement in terms of quality and safety. Under 10 CFR 50.55a(a)(3)(ii), the licensee must show that compliance with the original requirement results in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. Examples of hardship and/or unusual difficulty include, but are not limited to, excessive radiation exposure, disassembly of components solely to provide access for examinations, and development of sophisticated tooling that would result in only minimal increases in examination coverage.

In accordance with 10 CFR 50.55a(g)(5)(iii), a licensee may submit a request for relief from ASME Code requirements. If a licensee determines that conformance with certain ASME Code requirements is impractical for its facility, the licensee shall notify the Commission and submit, as specified in 10 CFR 50.4, information to support that determination. When a licensee determines that an inservice inspection requirement is impractical, e.g., the system would have to be redesigned

ENCLOSURE

or a component would have to be replaced to enable inspection, the licensee should cite this part of CFR to support the criteria for evaluation. The NRC may, giving due consideration to the burden placed on the licensee, impose an alternative examination requirement.

#### STAFF REQUESTS

The staff has reviewed the information submitted by the licensee in a letter dated October 8, 1996, containing Revision 4 to the first 10-year inservice inspection program. Revision 4 includes editorial corrections, incorporates approved relief requests, and submits seven new requests. As requested by the licensee, the review of Relief Request NR-29 is being expedited. To support this review, further clarification is being requested for Relief Request NR-29 only, at this time.

##### A. General Comment

Based on the review of Relief Request NR-29, it appears that the licensee is requesting relief from Code volumetric examination technique and procedural requirements (i.e. ASME Section XI, ASME Section V, Article 4, and Regulatory Guide 1.150). As an alternative, the licensee proposes to implement a performance based procedure. It is generally agreed that qualification by demonstration would provide a basis to conclude that the flaw detection capabilities of a performance based procedure would be at least equal to that of past examinations. However, the qualification of volumetric examination techniques in accordance with the Performance Demonstration Initiative (PDI), is currently under review by the Staff. As such, performance based qualifications do not preclude the requirement to satisfy the Code of record for a plant or other commitments that the licensee may have made.

##### B. Specific Information Required

1. From the initial review of the subject relief, the staff cannot determine the specific part(s) of the Code or regulations for which relief is being requested. As such, please describe the differences between the requirements associated with the Code of record and commitments for the licensee's plant, and the performance based ultrasonic examination procedure being implemented to satisfy the subject examinations.
2. Provide the basis to conclude that the proposed alternative will meet or exceed current Code requirements.
3. Verify that scanning of welds will be performed from both sides of the weld on the same surface where feasible.