

June 7, 2000

Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: APPROVAL TO IMPLEMENT A CHECK VALVE INSERVICE TESTING PROGRAM USING ASME OM CODE-1995 EDITION, OMA-1996 ADDENDA AT THE COMMONWEALTH EDISON COMPANY NUCLEAR STATIONS (TAC NOS. MA8703, MA8704, MA8715, MA8716, MA8717, MA8718, MA8803, MA8804, MA8733, AND MA8734)

Dear Mr. Kingsley:

By letter dated April 18, 2000, the Commonwealth Edison (ComEd) Company requested the Nuclear Regulatory Commission's (NRC's) approval to implement the check valve portion of the American Society of Mechanical Engineers (ASME) OM Code-1995 Edition, 1996 Addenda, at all ComEd Nuclear Stations, in advance of incorporating the ASME OM Code-1995 Edition with the 1996 Addenda, in its entirety as its Code of Record, pursuant to 10 CFR 50.55a(f)(4)(iv). The request applies to Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2.

ComEd requested approval to implement the check valve portion of the Code by July 15, 2000, in order to support the inservice testing (IST) of check valves scheduled to be examined during the fall refueling outages of 2000. Implementation of the ASME OMa-1996 Code Addenda, Appendix II, and the required modifications will be phased in for all check valves at all ComEd Nuclear Stations. Full implementation of the ASME OMa-1996 Code Addenda will be completed by September 1, 2001. Copies of the updated IST Program Plans for all of the stations will be provided to the NRC at the time of full implementation. During the transition, ComEd will not selectively apply its current Code of Record requirements and ASME OMa-1996 Code Addenda requirements for any individual check valve.

The NRC's amendment to 10 CFR 50.55a regulations, published in the Federal Register on September 22, 1999, incorporated by reference the 1995 Edition up to and including the 1996 Addenda to the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) in §50.55a(b)(3), with certain modifications required when implementing Appendix II as stated in §50.55a(b)(3)(iv).

Two significant changes to IST of check valves were included in the ASME OMa Code-1996 Addenda to: (1) correct certain anomalies in the way exercising of check valves is currently being implemented, and (2) codify a process for monitoring the valve's operating condition and performance. This integral two-part improvement to the Code provides interrelated requirements. Section ISTC 4.5.2 of the ASME OMa Code, "Exercising Requirements," and Section 4.5.4 "Valve Obturator Movement," were changed to require a bidirectional test to improve on the detection of valve degradation and failure. The change to Section ISTC 4.5.5 "Condition Monitoring Program" allowed for the use of a codified condition monitoring process as an alternative to the exercising and testing requirements of Sections ISTC 4.5.1 through 4.5.4. The condition monitoring process is defined in the ASME OMa Code Appendix II, "Check Valve Condition Monitoring Program." The condition monitoring process allows the licensee certain flexibility in establishing the types of test, examination, and preventive maintenance activities and their associated intervals, when justified based on the valve's performance and operating condition. These Code changes were developed so licensees, who elect not to implement the ISTC 4.5.5 alternative Condition Monitoring Program in their IST Plan, would be required to use ISTC 4.5.1 through 4.5.4 as a default set of testing and examination requirements.

The NRC staff considers the Condition Monitoring Program approach of Appendix II, for check valve IST with the modifications in the amendment to the 10 CFR 50.55a regulations, to be a significant improvement over present Code requirements, and encourages licensees to implement Appendix II. The use of the ISTC 4.5.5 alternative IST program provides the licensee with knowledge of the valve's operating condition, informed and verified expectations of the valve's performance over extended intervals, and a process to reduce the burden of unnecessary IST.

The regulation in §50.55a(f)(4)(iv) states, "Inservice tests of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met."

In the statement of consideration of the amendment to 10 CFR 50.55a (64 FR 51388), the NRC stated it would "favorably consider a request by a licensee under §50.55a(f)(4)(iv) to apply Appendix II in advance of incorporating the 1995 Edition with 1996 Addenda of the ASME OM Code as its Code of Record if the licensee's request justifies: (1) The modifications to Appendix II contained in the rule have been satisfied, and (2) All portions of the 1995 Edition with the 1996 Addenda of the OM Code that apply to check valves are implemented for the remaining check valves not included in the Appendix II program."

The staff finds that in its letter ComEd has committed to comply with the required Code and regulatory requirements as described above. Therefore, the staff concludes that ComEd's request to use the check valve portion of the 1996 Addenda of the ASME OM Code, including Appendix II, at all ComEd Nuclear Stations as contained in the described commitment and implementation sequence may be approved pursuant to 10 CFR 50.55a(f)(4)(iv).

Sincerely,

/RA/

Donna M. Skay, Project Manager, Section 2
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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249, 50-254,
50-265, 50-373, 50-374,
50-454, 50-455, 50-456,
and 50-457

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The staff finds that in its letter ComEd has committed to comply with the required Code and regulatory requirements as described above. Therefore, the staff concludes that ComEd's request to use the check valve portion of the 1996 Addenda of the ASME OM Code, including Appendix II, at all ComEd Nuclear Stations as contained in the described commitment and implementation sequence may be approved pursuant to 10 CFR 50.55a(f)(4)(iv).

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Donna M. Skay, Project Manager, Section 2
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