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BW03004

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. 50-456 and 50-457

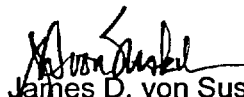
Subject:      Regulatory Commitment Change Summary Report

Please find enclosed the Regulatory Commitment Change Summary Report for Braidwood Station.

This report contains summary information for regulatory commitment changes from  
January 1, 2002 through December 31, 2002.

If you have any questions regarding this report, please contact Amy Ferko, Regulatory Assurance  
Manager, at (815) 417-2699.

Respectfully,

  
James D. von Suskil  
Site Vice President  
Braidwood Station

Attachment

cc:      Regional Administrator - Region III  
         NRC Braidwood Senior Resident Inspector

A001

**Attachment  
Braidwood Station  
Regulatory Commitment Change Summary Report**

**Originating Document:**

Response to Nuclear Regulatory Commission (NRC) Generic Letter (GL) 97-06, dated March 20, 1998.

**Subject of Change:**

Revise the commitment for Westinghouse Model D-5 S/G inspections from the response to NRC GL 97-06, "Degradation of Steam Generator Internals" contained in ComEd to NRC letter dated March 20, 1998.

**Original Commitment:**

In response to NRC GL 97-06, "Degradation of Steam Generator Internals," ComEd to NRC transmittal dated March 20, 1998 (ComEd Response), ComEd committed to perform the following two inspections each refueling outage in the Westinghouse Model D-5 steam generators (Byron Unit 2 and Braidwood Unit 2).

1. Inspection of Tube Support Plates (TSP)
  - a. "At present, 100% of the tube-to-tube support plate intersections are inspected each refueling outage with eddy current."
  - b. "100% of the tube-to-tube support plate intersections will be inspected each refueling outage with the conventional bobbin coil probe for identifying distorted tube support plate signals, anomalies and to verify proper location of the TSP's."
2. Inspection of Pre-heater Water Box Tubes
  - a. "Eddy current inspections of peripheral and T-slot tubes within the pre-heater will be undertaken at each scheduled refueling outage to detect loose parts and any tubes with significant tube wall degradation."

**Revised Commitment:**

The intent of the above two commitments was to perform the inspections in all four steam generators each refueling outage. The commitment revision will limit the scope of the inspections to the steam generators selected for inspection. The commitments will read as follows."

1. Inspection of Tube Support Plates

- a. "100% of the tube-to-tube support plate intersections will be inspected with eddy current in accordance with the EPRI PWR Steam Generator Examination Guidelines sampling plan requirements, at a minimum."
  - b. "100% of the tube-to-tube support plate intersections in those steam generators selected for inspection will be inspected with the conventional bobbin coil probe for identifying distorted tube support plate signals, anomalies, and to verify proper location of the TSP's."
2. Inspection of Pre-heater Water Box Tubes
- a. "Eddy current inspections of peripheral and T-slot tubes within the pre-heater of those steam generators selected for inspection will be undertaken to detect loose parts and any tubes with significant tube wall degradation."

All other information and commitments contained in the GL response will remain unchanged.

**Basis:**

The ComEd Response states that ComEd's steam generator inspection programs are in accordance with NEI 97-06, "Steam Generator Program Guidelines". These guidelines allow up to two fuel cycles between inspections if it can be shown that steam generator integrity is not compromised throughout the next operating period until the inspections are performed. The industry guidelines and Exelon procedures require this type of evaluation to be conducted prior to each inspection to ensure the appropriate inspections are performed to maintain SG integrity over the current and future operating periods.

Westinghouse WCAP-15093, "Evaluation of EDF Steam Generator Internals Degradation – Impact of Causal Factors on the Westinghouse Models F, 44f, D, and E2 Steam Generators", concludes that the Byron/Braidwood Unit 2 steam generators are not susceptible to the type of degradation described in the GL, which includes patch plate weld degradation, TSP ligament cracking, wrapper drop, or TSP flow hole erosion-corrosion. Westinghouse Technical Bulletin NSD-TB-97-05, "Water Box Erosion," provides potential degradation growth data that can be used in determining the appropriate water box inspection interval using NEI 97-06 methods. The data supports more than one cycle between inspections and SG integrity is maintained within structural limits. The inspections described in the ComEd Response were performed in A2R07 and A2R08 and no degradation was found.

The Westinghouse Model D-5 design and the Exelon SG Management Program, which implements industry guidance, ensure SG integrity is maintained with longer inspection cycles.

**Attachment  
Braidwood Station  
Regulatory Commitment Change Summary Report**

**Originating Document:**

Response to NRC violation 50-457/91026-02

**Subject of Change:**

Revise commitment for incorporation of a "lubrication task checklist" into using a formal Work Order for lubrication.

**Original Commitment:**

Incorporate a "Lubrication Task Checklist" into the station's lubrication program procedure for all lubrication that renders plant equipment inoperable.

**Revised Commitment:**

Maintenance will perform all lubrication that renders plant equipment inoperable per a formal Work Order. Clearance Orders will be requested per applicable procedures.

**Basis:**

Organizational changes have shifted lubrication duties from Operations to Maintenance. Maintenance procedures require a formal Work Order to perform the lubrication tasks.

**Attachment  
Braidwood Station  
Regulatory Commitment Change Summary Report**

**Originating Document:**

Response to NRC violation 456/87-007-06

**Subject of Change:**

Revise the commitment for scheduling, maintenance of records, etc. for lubrication activities to comply with formal work control process.

**Original Commitment:**

In response to NRC violation 456/87-007-06 the following commitment was made.

- A. A written notification form has been included to facilitate the notification of the cognizant department head and/or operating engineer when a scheduled lubrication activity falls behind schedule.
- B. Specific requirements for the maintenance of lubrication records, including content, record location and retention times have been incorporated.
- C. The Shift Engineer and Station Control Room Engineer (SCRE) are no longer required to receive a copy of the lubrication schedule. A programmatic evolution shifted the responsibility for the administration of the lubrication program within the operating department from the operators to the fuel handlers. This obviated the need for the Shift Engineer and SCRE to be notified of scheduled lubrications since they were no longer responsible for the schedule. If a safety-related piece of equipment is required to be made unavailable for lubrication purposes, the Shift Engineer and SCRE are notified via an out-of-service request.
- D. For safety-related equipment that is taken out-of-service for lubrication, a requirement has been added for the conduct of a post-lubrication operability run.
- E. A requirement has been added for the operating, mechanical maintenance, and electrical maintenance departments to ensure that equipment is left in a clean condition after maintenance or lubrication. In addition, the station lubrication coordinator is also responsible for ensuring that equipment is left in a clean condition after lubrication.

### **Revised Commitment:**

The revised commitment is as follows:

- A. Notification of all past due and past late preventive maintenance activities (PM's) is provided via the computer PM program database. Reports are run off of this database and provided to all department heads and/or cognizant personnel.
- B. Retention of lubrication results/performance is maintained per the PM program requirements and the station's/company's document retention procedure(s).
- C. Operating shift personnel are no longer required to receive a copy of the lubrication schedule. Shift personnel are no longer required to be notified of scheduled lubrication since they are no longer responsible for the schedule. This is a function of the work control process. If a safety-related piece of equipment is required to be made unavailable for lubrication purposes, the appropriate operating shift personnel are notified via an out-of-service (clearance order) request.
- D. Post maintenance tests (PMT's) are assigned per the company's maintenance procedures to perform operability testing following maintenance or lubrication on equipment that has been taken out of service.
- E. The Maintenance department ensures that equipment is left in a clean condition after maintenance or lubrication.

### **Basis:**

- A. The end result of tracking and providing the proper level of attention to lubrications that have gone overdue is maintained. Due to computer and organizational changes, the exact method, as described in the original commitment is no longer valid.
- B. Retention of lubrication results/performance is maintained per the PM program requirements and the station's/company's document retention procedures. Having separate department retention files means that not all personnel are aware of all retention locations and that those records are not retrievable by anyone outside of that particular department. Therefore, these records should be retained to the same standards as any other predefined task. A hard copy is not required as the document of record is included in the computer based Passport system.

- C. The work control department and processes ensure that the schedule is adhered to in order to maintain plant priorities. Equipment required to be out of service for maintenance or lubrication is requested per the current clearance order procedure.
- D. PMT's are now a formal process and are assigned per the company's maintenance procedures.
- E. Cleanliness of equipment following maintenance activities is now a maintenance department worker expectation. The responsibilities of the station lubrication coordinator are mostly administrative/programmatic in nature and should not include any sort of walkdown or verification of as left cleanliness of work sites.