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U. S. Nuclear Regulatory Commission
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Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Subject: Response to Request for Additional Information Regarding Risk Informed Inservice Inspection Program

References:
(1) Letter from T. J. Tulon (Commonwealth Edison Company) to U.S. NRC, "Braidwood Station Interval 2 Inservice Inspection Program: Relief Request I2R-39, Alternative to the ASME Boiler and Pressure Vessel Code, Section XI, Requirements for Class 1 and Class 2 Piping Welds", dated October 16, 2000

(2) Letter from William Levis (Commonwealth Edison Company) to U.S. NRC, "Byron Station Interval 2 Inservice Inspection Program, Relief Request I2R-40, Alternative to the ASME Boiler and Pressure Vessel Code, Section XI, Requirements for Class 1 and Class 2 Piping Welds," dated November 17, 2000

In the above referenced letters, Commonwealth Edison Company, now Exelon Generation Company, LLC, requested approval of an alternative to the existing edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," requirements for the selection and examination of Class 1 and 2 piping welds. This alternative utilizes the "risk-informed" inservice inspection (RI-ISI) program methodology discussed in Electric Power Research Institute (EPRI) Topical Report (TR) 112657, "Revised Risk-Informed Inservice Inspection Evaluation Procedure," Revision B-A, December 1999.

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In Section 4.0, "Implementation and Monitoring Program," of the referenced letters, we stated that, as a minimum, the risk ranking of piping segments and element selections will be reviewed and adjusted on an ASME ISI "Interval" basis. During a November 1, 2001, teleconference call between members of the NRC and EGC, it was agreed that the risk ranking of piping segments will be reviewed and adjusted on an ASME ISI "Period" basis. This review will be documented internally, and the results need not be submitted to the NRC on the "Period" frequency. We also understand that the RI-ISI program is a living program and its implementation will require feedback of new, relevant information to ensure the appropriate identification of safety significant piping locations. More frequent adjustment of the piping segment risk ranking may also be required as directed by future NRC bulletin or generic letter requirements, or by industry and plant-specific feedback.

The RI-ISI program will be updated and submitted to the NRC at the end of the 10-year ISI interval. This submittal may again take the form of a relief request to implement an updated RI-ISI program depending on future regulatory requirements. The RI-ISI program may be submitted to the NRC prior to the end of the 10-year ISI interval if there is a deviation from the RI-ISI methodology described in the initial 10-year interval ISI submittal to the NRC for that interval; or if industry experience determines that there is a need for significant revision to the program as described in the initial 10-year interval ISI submittal to the NRC for that interval.

We anticipate implementing the RI-ISI program methodology during the Byron Station, 2002, Spring refueling outage scheduled to begin on March 12, 2002; therefore, we request that the NRC review and approve the use of this methodology by March 1, 2002.

Please direct any questions you may have regarding this submittal to Mr. J. A. Bauer at (630) 657-2801.

Respectfully,

K. A. Ainger

K. A. Ainger
Director – Licensing
Mid-West Regional Operating Group

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Senior Resident Inspector – Byron Station

bcc: NRC Project Manager for Braidwood Station - NRR
NRC Project Manager for Byron Station - NRR
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