

July 8, 2004

Mr. Christopher M. Crane, President
and Chief Nuclear Officer
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CORRECTION TO THE REQUEST FOR ADDITIONAL INFORMATION
REGARDING BULLETIN 2003-01 BYRON STATION, UNITS 1 AND 2, AND
BRAIDWOOD STATION, UNITS 1 AND 2 (TAC NOS. MB9560, MB9561,
MB9558, AND MB9559)

Dear Mr. Crane:

By letter dated May 4, 2004, we issued a Request for Additional Information (RAI) regarding the Exelon Generation Company, LLC (Exelon) response to Nuclear Regulatory Commission (NRC) Bulletin 2003-01, Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors.

We have determined that there needs to be a clarification to one of the sentences in RAI #2. Specifically, the fourth sentence should read, "Since there may be some time before sump screens plug, for larger break sizes, refilling the RWST upon switchover to sump recirculation, or soon thereafter, could provide a ready source of additional makeup inventory should sump recirculation be lost." The revised RAI is enclosed in its entirety with the word change in bold type. This change has been discussed with the Exelon staff and we have agreed to extend the RAI due date until July 16, 2004, so that Exelon staff can determine if there is an effect on their response and, if so, revise the RAI response accordingly. We apologize for the late change in the RAI.

Please contact me if there are questions regarding the RAI.

Sincerely,

/RA/

George F. Dick, Jr., Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455,
STN 50-456 and STN 50-457

Enclosure: RAI

cc w/encl: See next page

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STN 50-456 and STN 50-457

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

BULLETIN 2003-01, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON
EMERGENCY SUMP RECIRCULATION AT PRESSURIZED WATER REACTORS"

EXELON GENERATION COMPANY, LLC

BYRON STATION, UNITS 1 AND 2

BRAIDWOOD STATION, UNITS 1 AND 2

DOCKET NOS. STN 50-454, STN-455, STN-456, AND STN-457

By letter dated August 6, 2003, Exelon Generation Company, LLC (Exelon, the licensee) responded to Nuclear Regulatory Commission (NRC) Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors," for Byron Station, Units 1 and 2, (Byron) and Braidwood Station, Units 1 and 2 (Braidwood).

During the course of review of the licensee's bulletin response, the staff has determined that it needs the following information:

1. The Westinghouse Owners Group (WOG) has developed operational guidance in response to Bulletin 2003-01 for Westinghouse and Combustion Engineering type PWR's. For Byron and Braidwood, the licensee's response stated that they will monitor the WOG activities and will consider implementation of any issued guidance. Please provide a discussion of the WOG recommended compensatory measures that have been or will be implemented for the plants. Include a discussion of the evaluations or analyses performed to determine that these compensatory measures are acceptable for Byron and Braidwood, and provide technical justification for those WOG compensatory measures not being implemented. Also include a detailed discussion of the procedures being modified, the operator training being implemented, and the schedule for implementing these compensatory measures.
2. In response to Bulletin 2003-01, the licensee stated that guidance is given in emergency procedures to address refueling water storage tank (RWST) refill once it has been determined that a complete loss of emergency coolant recirculation capability exists. The intent of Bulletin 2003-01 is for licensees to consider implementing compensatory measures to reduce the risk associated with potentially degraded or nonconforming emergency core cooling systems (ECCS) and containment spray system recirculation functions. As such, the timing of implementing this guidance in the plants' emergency procedures may not be consistent with the intent of the bulletin. **Since there may be some time before sump screens plug, for larger break sizes, refilling the RWST upon switchover to sump recirculation, or soon thereafter, could provide a ready source of additional makeup inventory should sump recirculation be lost.** For smaller break sizes, early initiation of RWST refill, such as prior to sump recirculation, could effectively prolong the time to switchover and possibly increase the opportunity for plant recovery without necessitating switchover, thereby reducing the potential for ECCS recirculation sump blockage. In the August 6, 2003, response, the licensee did not commit to modifying the procedures to include refilling the RWST prior to or upon switchover to ECCS recirculation. Given the uncertainty associated with this issue, and the potential benefits of implementing this compensatory measure, please

explain the basis for not including refilling the RWST earlier in the procedures.

In addition, please provide a detailed description of how the current emergency operating procedures address a loss of ECCS recirculation capability.

3. NRC Bulletin 2003-01 provides possible interim compensatory measures licensees could consider to reduce risks associated with sump clogging. In addition to those compensatory measures listed in Bulletin 2003-01, licensees may also consider implementing unique or plant-specific compensatory measures, as applicable. Please discuss any possible unique or plant-specific compensatory measures that were considered for implementation at Byron and Braidwood. Include a basis for rejecting any of these additional measures considered.