

10 CFR 50.90

RS-05-047

April 14, 2005

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

Subject: Supplement to Request for Exigent License Amendment Related to Technical Specification 5.5.9, "Steam Generator (SG) Tube Surveillance Program"

Reference: Letter from J. A. Bauer (Exelon Generation Company, LLC) to NRC, "Request for Exigent License Amendment Related to Technical Specification 5.5.9, "Steam Generator (SG) Tube Surveillance Program," dated April 11, 2005

In the referenced letter, Exelon Generation Company, LLC (EGC), in accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," requested a change to Appendix A, Technical Specifications (TS) of Facility Operating License Nos. NPF-72 and NPF-77 for Braidwood Station, Units 1 and 2, respectively.

The proposed one time change would revise TS 5.5.9, "Steam Generator (SG) Tube Surveillance Program," to incorporate changes in the SG inspection scope for Braidwood Station, Unit 2, during Refueling Outage 11 and the subsequent operating cycle. The proposed changes are applicable to only Unit 2 for inspections during Refueling Outage 11 and for the subsequent operating cycle. The proposed changes modify the inspection requirements for portions of SG tubes within the hot leg tubesheet region of the SGs. The license for Braidwood Station, Unit 1, is affected only due to the fact that Braidwood Station, Units 1 and 2 use common TS.

TS 5.5.9.e.6, "Plugging or Repair Limit," defines the imperfection depth at or beyond which the tube shall be removed from service by plugging or repaired by sleeving in the affected area. The change requested in the referenced letter proposed to revise the existing definition by inserting the following two paragraphs:

"For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, this definition does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require repair.

For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, degradation identified in the portion of the tube from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be repaired upon detection.”

After review of this proposed change, the NRC requested that the proposed change be revised to add more specificity to the requirements that will be implemented during Refueling Outage 11 and the subsequent operating cycle. Therefore, based on follow-up discussions with the NRC, EGC proposes to revise TS 5.5.9.e.6 as follows (note that the requested change has been emphasized in bold typeface):

“For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, this definition does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require **plugging or** repair.

For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, degradation identified in the portion of the tube from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be **plugged or** repaired upon detection.”

Attachment 1, " Markup of Proposed Technical Specifications Page Changes for Braidwood Station," to this letter provides a revised markup of changes to TS 5.5.9.e.6. Attachment 2, "Typed Pages for Technical Specification Changes for Braidwood Station," provides the revised typed page associated with TS 5.5.9.e.6. Please note that other TS changes requested in the referenced letter are not affected by this supplemental submittal.

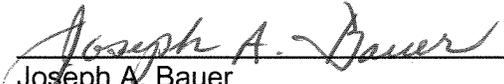
This proposed revision does not affect the supporting analysis for the original license amendment request as described in the referenced letter. No other information submitted with the referenced letter is affected by this change. The No Significant Hazards Consideration and the Environmental Consideration provided in Attachment 1 of the referenced letter are not affected by this change.

EGC is notifying the State of Illinois of this application for a change to the TS by sending a copy of this letter and its attachments to the designated State Official.

If you have any questions about this letter, please contact C. W. Szabo at (630) 657-2821.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 14, 2005



Joseph A. Bauer
Manager – Licensing

April 14, 2005
U.S. Nuclear Regulatory Commission
Page 3

Attachments:

Attachment 1: Markup of Proposed Technical Specifications Page Changes for Braidwood Station
Attachment 2: Typed Pages for Technical Specification Changes for Braidwood Station

Attachment 1

**BRAIDWOOD STATION
UNITS 1 AND 2**

Docket Nos. 50-456 and 50-457

License Nos. NPF-72 and NPF-77

Supplement to Request for Exigent License Amendment Related to Technical
Specification 5.5.9, "Steam Generator (SG) Tube Surveillance Program"

Markup of Technical Specifications Page

5.5-12

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Tube Surveillance Program (continued)

e. Acceptance Criteria

For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, this definition does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging or repair.

For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, degradation identified in the portion of the tube from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be plugged or repaired upon detection;

1. Imperfection means an exception to the dimensions, finish or contour of a tube or sleeve from that required by fabrication drawings or specifications. Eddy current testing indications $< 20\%$ of the nominal tube or sleeve wall thickness, if detectable, may be considered as imperfections;
2. Degradation means a service induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube or sleeve;
3. Degraded Tube means a tube or sleeve containing unrepaired imperfections $\geq 20\%$ of the nominal tube or sleeve wall thickness caused by degradation;
4. % Degradation means the percentage of the tube or sleeve wall thickness affected or removed by degradation;
5. Defect means an imperfection of such severity that it exceeds the plugging or repair limit. A tube or sleeve containing an unrepaired defect is defective;
6. Plugging or Repair Limit means the imperfection depth at or beyond which the tube shall be removed from service by plugging or repaired by sleeving in the affected area. The plugging or repair limit imperfection depth for the tubing is equal to 40% of the nominal wall thickness. The plugging limit imperfection depth for laser welded sleeves is equal to 38.7% of the nominal wall thickness. The plugging limit imperfection depth for TIG welded sleeves is equal to 32% of the nominal wall thickness .
7. Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an OBE, LOCA, or a steam line or feedwater line break as specified in Specification 5.5.9.d.4;

Attachment 2

**BRAIDWOOD STATION
UNITS 1 AND 2**

Docket Nos. 50-456 and 50-457

License Nos. NPF-72 and NPF-77

Supplement to Request for Exigent License Amendment Related to Technical
Specification 5.5.9, "Steam Generator (SG) Tube Surveillance Program"

Typed Technical Specifications Pages

5.5-9

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Tube Surveillance Program (continued)

e. Acceptance Criteria

1. Imperfection means an exception to the dimensions, finish or contour of a tube or sleeve from that required by fabrication drawings or specifications. Eddy current testing indications $< 20\%$ of the nominal tube or sleeve wall thickness, if detectable, may be considered as imperfections;
2. Degradation means a service induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube or sleeve;
3. Degraded Tube means a tube or sleeve containing unrepaired imperfections $\geq 20\%$ of the nominal tube or sleeve wall thickness caused by degradation;
4. % Degradation means the percentage of the tube or sleeve wall thickness affected or removed by degradation;
5. Defect means an imperfection of such severity that it exceeds the plugging or repair limit. A tube or sleeve containing an unrepaired defect is defective;
6. Plugging or Repair Limit means the imperfection depth at or beyond which the tube shall be removed from service by plugging or repaired by sleeving in the affected area. The plugging or repair limit imperfection depth for the tubing is equal to 40% of the nominal wall thickness. The plugging limit imperfection depth for laser welded sleeves is equal to 38.7% of the nominal wall thickness. The plugging limit imperfection depth for TIG welded sleeves is equal to 32% of the nominal wall thickness.

For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, this definition does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging or repair.

For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, degradation identified in the portion of the tube from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be plugged or repaired upon detection;