

September 9, 2008

Mr. Charles G. Pardee
Chief Nuclear Officer
and Senior Vice President
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2, AND BYRON STATION, UNIT NOS. 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION RELATED TO CONTAINMENT TENDON SURVEILLANCE PROGRAM (TAC NOS. MD8515, MD8516, MD8517, and MD8518)

Dear Mr. Pardee:

By letter to the Nuclear Regulatory Commission (NRC) dated April 9, 2008, Exelon Generation Company, LLC (the licensee) proposed changes to Technical Specifications (TSs) 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program," and 5.6.8, "Tendon Surveillance Report," for consistency with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, "Codes and standards," paragraph (g)(4) for components classified as American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Class CC.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete its review. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on August 19, 2008, it was agreed that you would provide a response within 60 days from the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1547.

Sincerely,

/RA/

Marshall J. David, Senior Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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

Enclosure:
Request for Additional Information

cc w/encl: See next page

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STN 50-454, and STN 50-455

Enclosure:
Request for Additional Information

cc w/encl: See next page

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NRR-088

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Byron/Braidwood Stations

cc:

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Via e-mail

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Via e-mail

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Via e-mail

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REQUEST FOR ADDITIONAL INFORMATION

BRAIDWOOD STATION, UNITS 1 AND 2

BYRON STATION, UNIT NOS. 1 AND 2

DOCKET NOS. STN 50-456, STN 50-457,

STN 50-454, AND STN 50-455

By letter to the Nuclear Regulatory Commission (NRC) dated April 9, 2008 (Agencywide Documents Access and Management System Accession No. ML081010540), Exelon Generation Company, LLC (the licensee) proposed changes to Technical Specifications (TSs) 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program," and 5.6.8, "Tendon Surveillance Report," for consistency with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, "Codes and standards," paragraph (g)(4) for components classified as American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Class CC. Specifically, the proposed changes would delete or replace the reference to the specific ASME Code year for the tendon surveillance program with a requirement to use the applicable ASME Code and addenda as required by 10 CFR 50.55a(g)(4).

In order to complete its review, the NRC staff requests the following additional information:

1. The NRC staff notes an inconsistency when comparing the wording used in the second sentence of revised TS Bases Section surveillance requirement (SR) 3.6.1.2 and in revised TS Section 5.5.6. Revised TS Bases Section SR 3.6.1.2 states that "Testing and Frequency are consistent with the requirements of 10 CFR50.55a, "Codes and standards" (Ref. 4)." Revised TS Section 5.5.6 states that "The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a, except where an alternative, exemption, or relief has been authorized by the NRC."

The NRC staff also notes an inconsistency when comparing the wording used in the second sentence of revised TS Bases Section SR 3.6.1.2 and in Bases Section SR 3.6.1.2 of NUREG-1431, Revision 3.1. Bases Section SR 3.6.1.2 of NUREG-1431 states that "Testing and Frequency are in accordance with the ASME Code, Section XI, Subsection IWL (Ref. X), and applicable addenda as required by 10 CFR 50.55a."

Please justify or resolve these inconsistencies.

2. The NRC staff notes that the reference to Regulatory Guide 1.35.1 has been removed from revised TS Section 5.5.6 and the revised TS Bases Section SR 3.6.1.2. The NRC staff notes that the last sentence of SR 3.6.1.2 was revised to read: "Predicted tendon lift off forces will be determined in accordance with the ASME Code, Section XI, Subsection IWL (Ref. 5), and applicable addenda as required by 10 CFR 50.55a." The NRC staff finds that the ASME Code, Section XI, Subsection IWL does not provide

Enclosure

guidance with regard to the determination of predicted tendon forces. Please resolve this inconsistency.

Also, please provide information regarding the method that will be used for determining the predicted prestressing tendon forces for the Tendon Surveillance Programs at Braidwood and Byron.