



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

March 16, 1992

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Document Control Desk

Subject: Commonwealth Edison Response to Generic  
Letter 91-13 for Byron and Braidwood Stations

Byron Units 1 and 2, NRC Docket  
Numbers 50-454 and 50-455

Braidwood Units 1 and 2, NRC Docket  
Numbers 50-456 and 50-457

Reference: Generic Letter 91-13, Request for Information Related to the Resolution  
of Generic Issue 130, "Essential Services Water System Failures at  
Multi-Unit Sites," dated September 19, 1991.

Dear Dr. Murley:

The referenced Generic Letter was issued to affected licensees to inform them of the technical findings resulting from the NRC resolution of Generic Issue 130, "Essential Service Water System Failures at Multi-Unit Sites." The Generic Letter also requested the affected licensees to determine the applicability of these technical findings to their sites.

These technical findings involve two issues; enhancement of the Technical Specifications related to the essential service water system (ESWS) and improvement of emergency procedures for a Loss of Service Water (LOSWS). The recommended procedure enhancements deal with;

- (a) operating and maintaining high-pressure injection (HPI) pump integrity in the event of a loss of reactor coolant pump (RCP) seals as a result of a ESWS failure,
- and
- (b) Periodic testing of the ESWS crosstie and manipulating during a LOSWS accident.

As requested, Commonwealth Edison (CECo) has reviewed the Generic Letter and has determined the issues to be applicable to Byron and Braidwood Stations. This issue has been addressed by CECo for Byron and Braidwood during the NRC's review of CECo's LCO Relaxation Program and the licensing of Byron Unit 2. Byron Station adopted Technical Specifications governing the availability of the third SX pump and the crosstie valves to support an operating unit. Braidwood Station incorporated similar requirements in plant procedures. These commitments have been previously reviewed and accepted by the NRC.

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Braidwood Station will request a License Amendment to add controls identical to the Byron Technical Specifications addressing this issue. Byron Station will take this opportunity to refine their current specifications, while not reducing the level of protection provided by these controls. These Technical Specification Amendment requests will be submitted by December 31, 1992.

Consistent with the emergency procedure recommendations listed above, Byron and Braidwood have already modified Abnormal and Emergency Operating procedures to address the use of the ESWS crosstie between units during a LOSW accident. Byron and Braidwood will be reviewing the Abnormal Operating Procedure for a loss of Essential Service Water to ensure that HPI pump integrity in the event of RCP pump seal loss during a LOSW is adequately addressed.

In conclusion, CECO has determined that although the Generic Letter is applicable to Byron and Braidwood Stations, the issues addressed by the proposed Technical Specifications have previously been addressed. Additional refinements will be contained in the upcoming proposed amendments. These amendments will be submitted by December 31, 1992. Also, the emergency procedure improvements recommended by the Generic Letter have, for the most part, already been implemented. Additional changes to these procedures will depend on the results of the upcoming reviews.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other CECO employees, contractor employees, or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

If there are any questions or comments, please contact me at (708) 515-7292.

Sincerely,

*D. J. Chrzanowski*

David J. Chrzanowski  
Nuclear Licensing Administrator  
Generic Issues

State of Ill, County of Cook  
Signed before me on this 16th day  
of March, 1992 by [Signature]

Notary Public [Signature]

- cc: A. Bert Davis, Regional Administrator - RIII
- R. Pulsifer, Project Manager - NRR/PDIII-2
- A. Hsia, Project Manager - NRR/PDIII-2
- R. Elliott, Project Engineer - NRR/PDIII-2
- S. DuPont, Senior Resident Inspector (Braidwood)
- W. Kropp, Senior Resident Inspector (Byron)

