



Exelon Generation Company, LLC

Braidwood Station  
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February 11, 2016  
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U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456, STN 50-457, and 72-73

Subject: Regulatory Commitment Change Summary Report

The purpose of this report is to provide the Exelon Generation Company, LLC (EGC) "Regulatory Commitment Change Summary Report" for Braidwood Station for commitment changes processed during the period from January 1, 2015 through December 31, 2015. The attached commitment changes were found to meet the criteria for inclusion in the annual Commitment Change Summary Report. Revisions to regulatory commitments were processed in accordance with Nuclear Energy Institute's (NEI) 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," dated July 1999 and applicable procedures.

Should you have any questions concerning this report, please contact Mr. Steven Reynolds, Regulatory Assurance Manager, at (815) 417-2800.

Respectfully,

A handwritten signature in black ink, appearing to read "Marri Marchionda-Palmer".

Marri Marchionda-Palmer  
Site Vice President  
Braidwood Station

Attachment: Regulatory Commitment Change Summary Report

cc: NRC Regional Administrator, Region III  
NRR Project Manager – Braidwood Station  
NRC Senior Resident Inspector, Braidwood Station  
Illinois Emergency Management Agency – Division of Nuclear Safety

**Attachment  
Braidwood Station  
Regulatory Commitment Change Summary Report**

**Commitment Change Tracking Number:** 2015-01

**Commitment Source Document:**

Letter from J.B. Hosmer (Commonwealth Edison Company, currently known as Exelon Generation Company, LLC) to U.S. NRC, "Commonwealth Edison Company (ComEd) Response to NRC Generic Letter (GL) 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves,"" dated March 15, 1997.

**Subject of Change:**

Document a one-time frequency extension for diagnostic testing of valve 2WO056A due to the testing exceeding the 10-year frequency requirement.

**Original Commitment:**

In this response, Exelon Generation Company, LLC (EGC), committed to participating in the Joint Owners Group (JOG) Periodic Verification Program for Motor-Operated Valves (MOVs). In the NRC's Safety Evaluation of the JOG Periodic Verification Program dated October 30, 1997, a static diagnostic testing frequency was established based on margin and safety significance for the specific MOV. The maximum frequency for static diagnostic testing of high margin and low risk MOVs is not to exceed 10 years. The periodic testing criteria were incorporated into procedure ER-AA-302, "Motor-Operated Valve Program Engineering Procedure," and its associated Training and Reference Material Guide ER-AA-302-1003, "MOV Margin Analysis and Periodic Verification Test Intervals."

**Revised Commitment:**

Actuator preventative maintenance activities including static diagnostic testing for Motor-Operated Valve 2WO056A, Chilled Water Inboard Containment Isolation Valve, was moved from outage A2R17 (May 2014) to on-line based on concerns for having to make changes to the MOV setup and subsequently having to perform a Local Leak Rate Test (LLRT) for 2WO056A. The LLRT would require draining the Chilled Water (WO) System and due to scheduling issues and containment environmental concerns the diagnostic testing was moved to on-line. The work was moved to on-line with a late due date of April 30, 2015 without an accurate understanding of the change in radiological dose that workers would receive while performing the work on-line. Estimates from a December 30, 2014 walkdown determined that performing the work on-line would result in a dose of approximately 5.1 person-rem as opposed to a dose of approximately 1.3 person-rem for performing the work during an outage. These estimates were determined from a detailed review of the scaffolding needed for the job, the area dose rates, and improved worker job time estimates. Based on this information, the MOV preventative maintenance activities were moved to refueling outage A2R18 (October 2015). The MOV was previously diagnostically tested on May 1, 2005 and, thus, the test frequency exceeded 10 years by approximately 6 months. This is a one-time frequency extension for diagnostic testing of valve 2WO056A. The valve will subsequently be tested in accordance with the established periodic verification program (i.e., during A2R24).

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**Basis:**

MOV 2WO056A is a containment isolation valve with a safety function to close on a containment phase A isolation signal. This valve is considered low risk and high margin in accordance with the periodic verification program. The valve is stroke tested quarterly in accordance with Operating Surveillance Procedure 2BwOSR 3.6.3.5.WO-1, "Containment Chilled Water Containment Isolation Valve Stroke Quarterly Surveillance," and the Inservice Testing Program (IST). This testing has indicated acceptable performance of the valve. Other preventative maintenance activities including stem lubrications, actuator lubrication samples and electrical inspections have been performed within their specified frequency with no issues noted. Additionally, similar MOVs including 1(2) WO006A/B, 1(2)WO020A/B, 1(2)WO056B and 1WO056A have been tested in accordance with the IST and the MOV periodic verification programs with acceptable results. Consequently, delaying performance of static diagnostic testing on 2WO056A until A2R18 was determined not to affect continued acceptable performance of this valve.

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Regulatory Commitment Change Summary Report**

**Commitment Change Tracking Number:** 2015-02

**Commitment Source Document:**

Letter from K.R. Jury (Exelon Generation Company, LLC) to U.S. NRC, "Nine-Month Response to Generic Letter 2008-01," dated October 14, 2008.

**Subject of Change:**

Revise the regulatory commitment associated with performing ultrasonic testing (UT) of Generic Letter 2008-01 subject systems on a graded approach as part of venting verification.

**Original Commitment:**

EGC will revise periodic venting procedures for the GL 2008-001 subject systems to include enhanced acceptance criteria and requirements to perform UTs on a graded approach as part of venting verifications of accessible high points.

**Revised Commitment:**

This regulatory commitment is no longer required based on implementation of Technical Specification (TS) Amendment No. 183, issued on June 19, 2015.

**Basis:**

TS Amendment No. 183 implements Technical Specification Task Force (TSTF)-523 which revises TS Surveillance Requirements (SRs) and the associated TS Bases to address GL 2008-01 concerns. Revised and new TS SRs 3.4.6.4, 3.4.7.4, 3.4.8.3, 3.5.2.3, 3.6.6.9, 3.9.5.2, and 3.9.6.3 require verifying that locations susceptible to gas accumulation are sufficiently filled with water. Any non-zero void acceptance criteria contained in the associated implementing procedures for the TS SRs are based on design basis calculations. Additionally, the frequencies associated with performing the TS SRs for susceptible locations is controlled in accordance with the Surveillance Frequency Control Program (SFCP). Changes to any of the surveillance frequencies associated with susceptible locations will be made in accordance with the methodology described in NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1, which is referenced in TS 5.5.19, "Surveillance Frequency Control Program." The original Regulatory Commitment is no longer required since operability is now adequately demonstrated by changes to the Technical Specifications as a result of the implementation of TS Amendment No. 183.