



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

USNRC
OFFICE OF ADMINISTRATION

'94 MAR 14 4 22:05

March 9, 1994

10069

R. Kiesel

58FR95738

12/16/93

(8)

Chief, Rules and Directives Review Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Braidwood Station Units 1 and 2
Byron Station Units 1 and 2
Dresden Station Units 2, and 3
LaSalle County Station Units 1 and 2
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2

Comments to Draft NUREG 1482 Supplement 1 To
Generic Letter 89-04 "Guidance On Developing
Acceptable Inservice Testing Programs"

NRC Dockets 50-454 and 50-455
NRC Dockets 50-456 and 50-457
NRC Dockets 50-237 and 50-249
NRC Dockets 50-373 and 50-374
NRC Dockets 50-254 and 50-265
NRC Dockets 50-295 and 50-304

- Reference: 1) NUREG 1482 (DRAFT), "Guidelines for Inservice
Testing at Nuclear Power Plants."
- 2) Generic Letter 89-04, "Guidance on Developing
Acceptable Inservice Testing Programs."

Commonwealth Edison Company appreciates the opportunity to
comment on NUREG 1482. We believe consistent, effective,
Inservice Testing Programs will be a critical component in the
industry's effort to provide safe, reliable plants into the 21st
Century. The framework laid out in NUREG 1482 is consistent with
these requirements and will provide significant assistance to the
industry.

In an attempt to further refine this guidance Commonwealth
Edison provides the following specific comment:

k:/dave/reg1482.wpf/1

9403170083 940309
PDR NUREG
1482 C PDR

Section 4.2.7 of the Draft NUREG under the heading NRC Recommendation states: "OM-10 specifies the allowable changes in stroke times from reference values. Therefore, when a licensee elects to compare measured stroke times to reference values, the requirements of paragraph 4.2.1.8, "Stroke Time Acceptance Criteria," of OM-10 and all related requirements such as testing requirements and corrective action apply. The staff has determined that it is acceptable for a licensee to implement this method in accord with 10 CFR 50.55a (f)(4)(iv) for use of portions of later editions of the Code approved in 10 CFR 50.55a(b) if all related requirements are met which include paragraphs 1.3, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 4.2.1.1-4.2.1.9, 5, and 6."

a) The following paragraphs from OM-10 are not related requirements to the methodology of measuring stroke time from a reference value as opposed to the previous test, and should be deleted from the list of related requirements: Paragraphs 3.1, 3.2, 3.6, and 4.2.1.1.

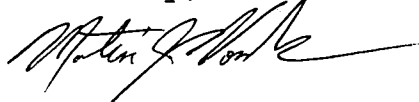
b) Generic Letter 89-04 approved, for valves with stroke times ten seconds or less, measuring stroke times from a reference value as opposed to the previous test. It stated that measuring changes in stroke times from a reference value as opposed to the previous test is an acceptable (and possibly better) alternative. Generic Letter 89-04 did not stipulate that OM-10 acceptance criteria and corrective actions had to be used with the reference value method, hence it was permissible to use the reference value method with ASME Section XI acceptance criteria and corrective actions. The NUREG reflects a change in the NRC's position on this issue since the original issue of Generic Letter 89-04. We feel it is unreasonable to require those plants who revised their procedures and testing techniques to use the reference value technique as described above and are still under the rules of ASME Section XI as opposed to OM-10, to revise their procedures and testing techniques to OM-10. We suggest that the NUREG position in 4.2.7 be revised to include wording similar to the following: "Plants with IST Programs under the rules of ASME Section XI who have revised their procedures and test methods to use the reference value method of measuring stroke time in accordance with the guidance of Generic Letter 89-04, may use either the ASME XI or the OM-10 acceptance criteria and corrective actions."

Rules and Directive Review Branch (3)

March 9, 1994

Please direct any questions pertaining to these comments to Mr. Donald Zebrauskas at (708) 663-7377.

Sincerely,



Martin J. Vonk
Generic Issues Administrator
Nuclear Regulatory Services

cc: J. Martin, Regional Administrator-RIII
R. Assa, Braidwood Project Manager, NRR
G. Dick, Byron Project Manager, NRR
A. Gody, Jr., LaSalle Project Manager, NRR
C. Patel, Quad Cities Project Manager, NRR
C. Shiraki, Zion Project Manager, NRR
J. Stang, Dresden Project Manager, NRR
S. Dupont, Senior Resident Inspector (Braidwood)
H. Peterson, Senior Resident Inspector (Byron)
M. Leach, Senior Resident Inspector (Dresden)
D. Hills, Senior Resident Inspector (LaSalle)
C. Miller, Senior Resident Inspector (Quad Cities)
J.D. Smith, Senior Resident Inspector (Zion)