Commonwealth Edison 1400 Opus Place Downers Grove, IL 60515



April 25, 1995

U.S. Nuclear Regulatory Commission Washington, DC 20555

Attention: Document Control Desk

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

Commonwealth Edison Comments; Draft Generic Letter, "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves," dated March 15, 1995

NRC Dockets 50-456 and 50-457 NRC Dockets 50-454 and 50-455 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

9505030477

ComEd appreciates the opportunity to comment on the draft generic letter and provides the following comments on the implementation schedule for the generic letter:

- The initial utility response to the Generic Letter should be adjusted from 30 days after Generic Letter issue to 60 days after Generic Letter issue. ComEd considers that it is appropriate for this response to coincide with the 60 day deadline for performing an initial susceptibility assessment. This removes some complexity in the Generic Letter schedule and allows utilities to consider lessons learned in their susceptibility reviews when preparing their initial Generic Letter response.
- The completion schedule in the draft generic letter requires that the guidance of the generic letter be fully implemented within 180 days of Generic Letter issue.

9504

This aggressive schedule appears to be inconsistent with the NRC's own urgency in issuing the generic letter (which has been in the planning stages for over one year). Because of the aggressive schedule and certain restrictions in the current form of the generic letter, the generic letter could force many unplanned shutdowns of nuclear stations.

k:\dave\preslck.wpf\'1

A Unicom Company

Document Control Desk

ComEd considers that the implementation schedule for this generic letter should be similar to that contained in supplement 3 of Generic Letter 89-10. Pressure locking / thermal binding failures are often unpredictable and non-repeatable; usually several system and valve specific conditions need to exist simultaneously for the problems to occur. Since a single event such as sudden reactor coolant system depressurization is not sufficient to cause the problem without other valve specific conditions existing, this is not a typical common mode failure concern. For this reason, ComEd suggests that the NRC allow utilities to consider potentially susceptible MOVs (which have not previously failed) to be deficient, rather than inoperable, for a period of one fuel cycle after the Generic Letter issue. This would allow ComEd to complete its plans to perform all modifications during the next outage of its nuclear units without any forced shutdowns.

Providing one fuel cycle for implementation would provide utilities adequate time to pre-plan and implement modifications without installing inappropriate modifications. The danger of installing an inappropriate modification should not be easily dismissed. ComEd is currently updating the fuel analysis for one of its stations to ensure leakage through holes in the disks of the SI and RHR Hot Leg injection valves would not significantly impact the ability to perform cold leg injection.

The draft generic letter states that it is only applicable to the "intended safety functions" for power operated valves. ComEd interprets this to mean the safety functions defined by the FSAR. Consequently, the generic letter is not considered to be applicable to non-safety related functions during operations, EOP functions, and recovery from mispositioning. ComEd does intend to review these functions for susceptibility to pressure locking and thermal binding, but this review and any resulting actions will be performed outside the Generic Letter program.

The terminology "All modes of plant operation including test configuration" is somewhat ambiguous. Typically valves in test configurations do not have intended safety functions identified in the FSAR. Many systems are out of service during surveillance testing. Under these circumstances, the valve would not have an intended safety function. Document Control Desk

ComEd considers that the explicit prohibition against using past performance and leakage for susceptibility exclusion does not apply to the use of these conditions for performing operability determinations. Past performance of an MOV under the conditions potentially susceptible to pressure locking / thermal binding should be sufficient justification to demonstrate operability of an MOV until it can be modified. Similarly, verified packing or seat leakage should be sufficient justification for interim operability evaluations related to pressure locking.

Past Performance alone may not be an acceptable exclusion criteria for Pressure Locking or Thermal Binding susceptibility. However, past performance supported by testing or calculation may be sufficient to exclude some applications from these concerns. The words in the generic letter appear to be too strict with respect to excluding past performance when performing susceptibility evaluations.

If there are any questions concerning this matter, or need for further clarification, please contact this office.

Sincerely Aartin L

Licensing Administrator

cc: J. Martin, Regional Administrator - RIII G. Dick, ComEd Generic Issues Project Manager - NRR