



April 10, 1997

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2
Byron Nuclear Power Station Units 1 and 2
Dresden Nuclear Power Station Units 2 and 3
LaSalle County Nuclear Power Station Units 1 and 2

Relief Requests from ASME Section XI, 1992 Edition with the 1992
Addenda, Article IWE-4000

NRC Docket Nos. 50-454 and 50-455
NRC Docket Nos. 50-456 and 50-457
NRC Docket Nos. 50-237 and 50-249
NRC Docket Nos. 50-373 and 50-374

10 CFR 50.55a(g)(4)(v) requires Class MC and CC pressure retaining components and their integral attachments to meet the applicable repair and replacement requirements of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda, Subsections IWA-4000, IWE-4000 and IWL-4000. The enclosed Relief Requests ask for relief from immediate compliance with the applicable repair and replacement requirements of Subsections IWA, IWE and IWL through December 31, 1997. Copies of the proposed Relief Requests are provided as attachments to this letter.

Due to the extended outages at LaSalle, containment tendon testing and inspections are desired to be performed. To support the testing and inspections, the possibility exists that this Relief Request will be required. Therefore, ComEd requests that these Relief Requests be approved by the NRC as soon as possible.

If there are any questions concerning this matter, please contact Marcia Lesniak at 630/663-6484.

Respectfully,

210035

John B. Hosmer
John B. Hosmer
Engineering Vice President

1/1 A047

Attachments

9704210122 970410
PDR ADOCK 05000237
P PDR

U.S. NRC Document Control
Page Two
April 10, 1997

cc: A. Beach, Regional Administrator - RIII
R. Capra, Project Directorate - NRR
R. Assa, Braidwood Project Manager - NRR
G. Dick, Byron Project Manager - NRR
J. Stang, Dresden Project Manager - NRR
D. Skay, LaSalle Project Manager - NRR
C. Phillips, Senior Resident Inspector - Braidwood
S. Burgess, Senior Resident Inspector - Byron
C. Vanderniet, Senior Resident Inspector - Dresden
M. Huber, Senior Resident Inspector - LaSalle
Office of Nuclear Facility Safety - IDNS

RELIEF REQUEST: NR-32

(Page 1 of 3)

COMPONENT IDENTIFICATION

Code Class: MC, CC
References: IWA-4000
IWE-4000
IWL-4000
Examination Category: E-A, E-B, E-C, E-D, E-F, E-G, and E-P
L-A, L-B
Item Number: All Class MC and CC components listed in Table IWE-2500-1 and IWL-2500-1
Description: ASME Section XI Repair and Replacement Procedures for IWE and IWL Components
Component Numbers: All Class MC components subject to Repair and Replacement rules of IWA-4000, IWE-4000, and IWL-4000

CODE REQUIREMENT

10 CFR 50.55a(g)(4)(v) requires Class MC and CC pressure retaining components and their integral attachments to meet the applicable repair and replacement requirements of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda, Subsections IWA-4000, IWE-4000, and IWL-4000.

BASIS FOR RELIEF

Relief is requested from immediate compliance with the repair and replacement requirements of Subsections IWE and IWL. Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested on the basis that immediate compliance with the aforementioned requirements would result in unusual difficulty without a compensating increase in the level of quality and safety.

A revision to 10 CFR 50.55a was published on August 8, 1996, which endorses Subsections IWE and IWL of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda. This revision requires the completion of an expedited examination by September 9, 2001. However, in a letter to the Nuclear Energy Institute (NEI) dated November 6, 1996, the NRC staff clarifies that all repair and replacement activities within the scope of Subsections IWE and IWL which are conducted after September 9, 1996 must be conducted in accordance with the applicable rules of Subsections IWE and IWL of ASME Section XI, 1992 Edition with the 1992 Addenda.

Immediate compliance with the repair and replacement rules of ASME Section XI, 1992 Edition with the 1992 Addenda for IWE components is impractical because substantial time and resources must be expended for the following major efforts:

RELIEF REQUEST: NR-32
(Page 2 of 3)

1. CONTAINMENT STRUCTURE COMPONENT CLASSIFICATION: The containment structures at Braidwood Station were constructed to the proposed rules of the 1973 ASME Section III, Division 2 Code. In order to comply with 10 CFR 50.55a(g)(4)(v), it will be necessary to identify and reclassify all containment components to Class MC and CC classification criteria. This effort will include the retrieval and review of all applicable fabrication and installation documentation, the development a basis document to identify the correct classification boundaries and the eventual development of an inservice inspection program to govern all IWE/IWL-related activities at Braidwood Station.
2. PROCEDURE REVISIONS: The requirements of Subsections IWE and IWL must be incorporated into applicable station procedures. The current Inservice Inspection program, (which includes the repair and replacement program), for Braidwood Station is currently based on the rules of ASME Section XI, 1983 Edition with the Summer 1983 Addenda, and only addresses the inservice inspection requirements for Class 1, 2, and 3 pressure retaining components and component supports. Therefore, various procedures that control Code repair and replacement activities must be revised to incorporate the unique requirements of Subsections IWE and IWL.
3. EXAMINER TRAINING AND CERTIFICATION: The unique examiner qualification required by Subsections IWE and IWL must be incorporated into the existing Commonwealth Edison (ComEd) certification and training program. The existing ComEd certification and training program only addresses the certification requirements for Class 1, 2 and 3 pressure retaining components and component supports. The ComEd certification and training program must be revised to incorporate the unique requirements of Subsections IWE and IWL.

Since the containment structures at Braidwood Station were constructed to the rules of Section III, all repair and replacement activities conducted on these components have been subjected to the ComEd Quality Assurance (QA) program, which implements the requirements of 10 CFR 50, Appendix B. The ComEd QA program requires repair and replacement activities to be conducted in accordance with the original design specifications using approved procedures. This approach assures applicable design bases are maintained. In addition, the containment structure integrity is verified by periodic pressure tests in accordance with Appendix J. The application of the requirements of Subsections IWE-4000 and IWL-4000 imposes added administrative burden (such as requirement for a repair/replacement plan and NIS-2 form) without providing a compensating increase in the level of quality or safety.

RELIEF REQUEST: NR-32
(Page 3 of 3)

PROPOSED ALTERNATE PROVISIONS

Until December 31, 1997, all repair and replacement activities conducted on Class MC containment structure components at Braidwood Station will be performed in accordance with the existing ComEd QA Program requirements. Compliance with ASME Section XI, 1992 Edition with the 1992 Addenda, Subsections IWE-4000 IWL-4000 will begin on January 1, 1998.

APPLICABLE TIME PERIOD

Relief is requested for the first ten-year interval of the Inservice Inspection Program for Braidwood Units 1 and 2 until December 31, 1997.

**BYRON UNIT 1
INSERVICE INSPECTION**

RELIEF REQUEST I2R-19

COMPONENT IDENTIFICATION

Code Class: MC and CC
References: IWE-4000
IWA-4000
Examination Category: E-A, E-B, E-C, E-D, E-F, E-G, and E-P
Item Number: All Class MC components listed in Table IWE-2500-1
All Class CC components listed in Table IWL-2500-1
Description: ASME Section XI Repair and Replacement Procedures for IWE and IWL
Component Numbers: All Class MC and Class CC components subject to Repair and Replacement rules of IWA-4000

CODE REQUIREMENT

10 CFR 50.55a(g)(4)(v) requires Class MC and CC pressure retaining components and their integral attachments to meet the applicable ASME Section XI repair and replacement requirements.

Articles IWE-4000 and IWL-4000 refer to Article IWA-4000 for Repair Procedures.

BASIS FOR RELIEF

Relief is requested from immediate compliance with the repair and replacement requirements of Subsection IWE and IWL. Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested on the basis that immediate compliance with the aforementioned requirements would result in unusual difficulty without a compensating increase in the level of quality and safety.

A revision to 10 CFR 50.55a was published on August 8, 1996, which endorses Subsections IWE and IWL of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda. This revision requires the completion of an expedited examination by September 9, 2001. However, in a letter to the Nuclear Energy Institute (NEI) dated November 6, 1996, the NRC staff clarifies that all repair and replacement activities within the scope of Subsections IWE and IWL which are conducted after September 9, 1996 must be conducted in accordance with the applicable rules of Subsections IWE and IWL of ASME Section XI, 1992 Edition with the 1992 Addenda.

Immediate compliance with the repair and replacement rules of ASME Section XI, 1992 Edition with the 1992 Addenda for IWE and IWL components is impractical because substantial time and resources must be expended for the following major efforts:

RELIEF REQUEST I2R-19

(Cont'd)

1. **CONTAINMENT STRUCTURE COMPONENT CLASSIFICATION:** The containment structures at Byron Station were constructed to the rules of Section III, 1971, 1973 and 1974 Editions, Quality Group B. In order to comply with 10 CFR 50.55a(g)(4)(v), it will be necessary to identify and reclassify all containment components to Class MC and Class CC classification criteria. This effort will include the retrieval and review of all applicable fabrication and installation documentation, the development of a basis document to identify the correct classification boundaries and the eventual development of an inservice inspection program to govern all IWE and IWL -related activities at Byron Station.
2. **PROCEDURE REVISIONS:** The requirements of IWE and IWL must be incorporated into applicable station procedures. The current Inservice Inspection program, (which includes the repair and replacement program), for Byron Station is currently based on the rules of ASME Section XI, 1989 Edition and only addresses the inservice inspection requirements for Class 1, 2 and 3 pressure retaining components and component supports. Therefore, various procedures that control Code repair and replacement activities must be revised to incorporate the unique requirements of Subsection IWE and IWL.
3. **EXAMINER TRAINING AND CERTIFICATION:** The unique examiner qualification required by Subsection IWE and IWL must be incorporated into the existing Commonwealth Edison (ComEd) certification and training program. The existing ComEd certification and training program only addresses the certification requirements for Class 1, 2 and 3 pressure retaining components and component supports. The ComEd certification and training program must be revised to incorporate the unique requirements of Subsection IWE and IWL.

Since the containment structures at Byron Station were constructed to the rules of Section III, Quality Group B, all repair and replacement activities conducted on these components have been subjected to the ComEd Quality Assurance (QA) program, which implements the requirements of 10 CFR 50, Appendix B. The ComEd QA program requires repair and replacement activities to be conducted in accordance with the original design specifications using approved procedures. This approach assures applicable design bases are maintained. In addition, the containment structure integrity is verified by periodic pressure tests in accordance with Appendix J. The application of the requirements of Subsections IWE-4000 and IWL-4000 imposes added administrative burden (such as requirement for a repair/replacement plan and NIS-2 form) without providing a compensating increase in the level of quality or safety.

PROPOSED ALTERNATE PROVISIONS

Until December 31, 1997, all repair and replacement activities conducted on Class MC and Class CC containment structure components at Byron Unit 1 will be performed in accordance with the existing ComEd QA Program requirements. Compliance with ASME Section XI, 1992 Edition with the 1992 Addenda, Subsections IWE-4000 and IWL 4000 will begin on January 1, 1998.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for Byron Unit 1 until December 31, 1997.

**BYRON UNIT 2
INSERVICE INSPECTION**

RELIEF REQUEST NR-21

COMPONENT IDENTIFICATION

Code Class: MC and CC
References: IWE-4000
IWA-4000
Examination Category: E-A, E-B, E-C, E-D, E-F, E-G, and E-P
Item Number: All Class MC components listed in Table IWE-2500-1
All Class CC components listed in Table IWL-2500-1
Description: ASME Section XI Repair and Replacement Procedures for IWE and IWL
Component Numbers: All Class MC and Class CC components subject to Repair and Replacement rules of IWA-4000

CODE REQUIREMENT

10 CFR 50.55a(g)(4)(v) requires Class MC and CC pressure retaining components and their integral attachments to meet the applicable ASME Section XI repair and replacement requirements.

Articles IWE-4000 and IWL-4000 refer to Article IWA-4000 for Repair Procedures.

BASIS FOR RELIEF

Relief is requested from immediate compliance with the repair and replacement requirements of Subsections IWE and IWL. Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested on the basis that immediate compliance with the aforementioned requirements would result in unusual difficulty without a compensating increase in the level of quality and safety.

A revision to 10 CFR 50.55a was published on August 8, 1996, which endorses Subsections IWE and IWL of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda. This revision requires the completion of an expedited examination by September 9, 2001. Additionally, in a letter to the Nuclear Energy Institute (NEI) dated November 6, 1996, the NRC staff clarifies that all repair and replacement activities within the scope of Subsections IWE and IWL which are conducted after September 9, 1996 must be conducted in accordance with the applicable rules of Subsections IWE and IWL of ASME Section XI, 1992 Edition with the 1992 Addenda.

Immediate compliance with the repair and replacement rules of ASME Section XI, 1992 Edition with the 1992 Addenda for IWE and IWL components is impractical because substantial time and resources must be expended for the following major efforts:

RELIEF REQUEST NR-21

(Cont'd)

1. **CONTAINMENT STRUCTURE COMPONENT CLASSIFICATION:** The containment structures at Byron Station were constructed to the rules of Section III, 1971, 1973 and 1974 Editions, Quality Group B. In order to comply with 10 CFR 50.55a(g)(4)(v), it will be necessary to identify and reclassify all containment components to Class MC and Class CC classification criteria. This effort will include the retrieval and review of all applicable fabrication and installation documentation, the development of a basis document to identify the correct classification boundaries and the eventual development of an inservice inspection program to govern all IWE and IWL -related activities at Byron Station.
2. **PROCEDURE REVISIONS:** The requirements of IWE and IWL must be incorporated into applicable station procedures. The current Inservice Inspection program, (which includes the repair and replacement program), for Byron Station is currently based on the rules of ASME Section XI, 1983 Edition with Summer 1983 Addenda and only addresses the inservice inspection requirements for Class 1, 2 and 3 pressure retaining components and component supports. Therefore, various procedures that control Code repair and replacement activities must be revised to incorporate the unique requirements of Subsection IWE and IWL.
3. **EXAMINER TRAINING AND CERTIFICATION:** The unique examiner qualification required by Subsection IWE must be incorporated into the existing Commonwealth Edison (ComEd) certification and training program. The existing ComEd certification and training program only addresses the certification requirements for Class 1, 2 and 3 pressure retaining components and component supports. The ComEd certification and training program must be revised to incorporate the unique requirements of Subsection IWE and IWL.

Since the containment structures at Byron Station were constructed to the rules of Section III, Quality Group B, all repair and replacement activities conducted on these components have been subjected to the ComEd Quality Assurance (QA) program, which implements the requirements of 10 CFR 50, Appendix B. The ComEd QA program requires repair and replacement activities to be conducted in accordance with the original design specifications using approved procedures. This approach assures applicable design bases are maintained. In addition, the containment structure integrity is verified by periodic pressure tests in accordance with Appendix J. The application of the requirements of Subsection IWE-4000 and IWL-4000 imposes added administrative burden (such as requirement for a repair/replacement plan and NIS-2 form) without providing a compensating increase in the level of quality or safety.

PROPOSED ALTERNATE PROVISIONS

Until December 31, 1997, all repair and replacement activities conducted on Class MC and Class CC containment structure components at Byron Station Unit 2 will be performed in accordance with the existing ComEd QA Program requirements. Compliance with ASME Section XI, 1992 Edition with the 1992 Addenda, Subsection IWE-4000 and IWL-4000 will begin on January 1, 1998.

APPLICABLE TIME PERIOD

Relief is requested for the first ten-year interval of the Inservice Inspection Program for Byron Unit 2 until December 31, 1997.

DRESDEN STATION
RELIEF REQUEST NUMBER: MCR-01
(Page 1 of 3)

COMPONENT IDENTIFICATION

Code Class: MC
References: IWE-4000
IWA-4000
Examination Category: E-A, E-B, E-C, E-D, E-F, E-G, and E-P
Item Number: All Class MC components listed in Table IWE-2500-1
Description: ASME Section XI Repair and Replacement Procedures for IWE
Component Numbers: All Class MC components subject to Repair and Replacement
rules of IWA-4000

CODE REQUIREMENT

10 CFR 50.55a(g)(4)(v) requires Class MC and CC pressure retaining components and their integral attachments to meet the applicable ASME Section XI repair and replacement requirements. Class CC (Subsection IWL) does not apply to Dresden Units 2 or 3.

Article IWE-4000 refers to Article IWA-4000 for Repair Procedures

BASIS FOR RELIEF

Relief is requested from immediate compliance with the repair and replacement requirements of Subsection IWE. Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested on the basis that immediate compliance with the aforementioned requirements would result in unusual difficulty without a compensating increase in the level of quality and safety.

A revision to 10 CFR 50.55a was published on August 8, 1996, which endorses Subsection IWE of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda. This revision requires the completion of an expedited examination by September 9, 2001. However, in a letter to the Nuclear Energy Institute (NEI) dated November 6, 1996, the NRC staff clarifies that all repair and replacement activities within the scope of Subsections IWE and IWL which are conducted after September 9, 1996 must be conducted in accordance with the applicable rules of Subsections IWE and IWL of ASME Section XI, 1992 Edition with the 1992 Addenda.

Immediate compliance with the repair and replacement rules of ASME Section XI, 1992 Edition with the 1992 Addenda for IWE components is impractical because substantial time and resources must be expended for the following major efforts:

RELIEF REQUEST NUMBER: MCR-01

(Page 2 of 3)

BASIS FOR RELIEF (Cont)

with the Summer 1965 Addenda, Class B. In order to comply with 10 CFR 50.55a(g)(4)(v), it will be necessary to identify and reclassify all containment components to Class MC classification criteria. This effort will include the retrieval and review of all applicable fabrication and installation documentation, the development of a basis document to identify the correct classification boundaries and the eventual development of an inservice inspection program to govern all IWE-related activities at Dresden Station.

2. **PROCEDURE REVISIONS:** The requirements of IWE must be incorporated into applicable station procedures. The current Inservice Inspection program, (which includes the repair and replacement program), for Dresden Station is currently based on the rules of ASME Section XI, 1989 Edition and only addresses the inservice inspection requirements for Class 1, 2 and 3 pressure retaining components and component supports. Therefore, various procedures that control Code repair and replacement activities must be revised to incorporate the unique requirements of Subsection IWE.
3. **EXAMINER TRAINING AND CERTIFICATION:** The unique examiner qualification required by Subsection IWE must be incorporated into the existing Commonwealth Edison (ComEd) certification and training program. The existing ComEd certification and training program only addresses the certification requirements for examination of Class 1, 2 and 3 pressure retaining components and component supports. The ComEd certification and training program must be revised to incorporate the unique requirements of Subsection IWE.

Since the containment structures at Dresden Station were constructed to the rules of Section III, and are classified as Safety Related, all repair and replacement activities conducted on these components are subjected to the ComEd Quality Assurance (QA) program, which implements the requirements of 10 CFR 50, Appendix B. The ComEd QA program requires repair and replacement activities to be conducted in accordance with the original design specifications using approved procedures. This approach assures applicable design bases are maintained. In addition, the containment structure integrity is verified by periodic pressure tests in accordance with Appendix J. The application of the requirements of Subsection IWE-4000 imposes added administrative burden (such as requirement for a repair/replacement plan and NIS-2 form) without providing a compensating increase in the level of quality or safety.

PROPOSED ALTERNATE PROVISIONS

Until December 31, 1997, all repair and replacement activities conducted on Class MC containment structure components at Dresden Station will be performed in accordance with the

RELIEF REQUEST NUMBER: MCR-01

(Page 3 of 3)

PROPOSED ALTERNATE PROVISIONS (Cont'd)

existing ComEd QA Appendix B Program requirements. Compliance with ASME Section XI, 1992 Edition with the 1992 Addenda, Subsection IWE-4000 will begin on January 1, 1998.

APPLICABLE TIME PERIOD

Relief is requested for the third ten-year interval of the Inservice Inspection Program for Dresden Units 2 and 3 until December 31, 1997.

RELIEF REQUEST: CR-19

(Page 1 of 3)

COMPONENT IDENTIFICATION

Code Class: MC, CC
References: IWA-4000
IWE-4000
IWL-4000
Examination Category: E-A, E-B, E-C, E-D, E-F, E-G, and E-P
L-A, L-B
Item Number: All Class MC and CC components listed in Table IWE-2500-1 and IWL-2500-1
Description: ASME Section XI Repair and Replacement Procedures for IWE and IWL Components
Component Numbers: All Class MC and CC components subject to Repair and Replacement rules of IWA-4000, IWE-4000, and IWL-4000

CODE REQUIREMENT

10 CFR 50.55a(g)(4)(v) requires Class MC and CC pressure retaining components and their integral attachments to meet the applicable repair and replacement requirements of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda, Subsections IWA-4000, IWE-4000, and IWL-4000.

BASIS FOR RELIEF

Relief is requested from immediate compliance with the repair and replacement requirements of Subsections IWE and IWL. Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested on the basis that immediate compliance with the aforementioned requirements would result in unusual difficulty without a compensating increase in the level of quality and safety.

A revision to 10 CFR 50.55a was published on August 8, 1996, which endorses Subsections IWE and IWL of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda.

This revision requires the completion of an expedited examination by September 9, 2001. However, in a letter to the Nuclear Energy Institute (NEI) dated November 6, 1996, the NRC staff clarifies that all repair and replacement activities within the scope of Subsections IWE and IWL which are conducted after September 9, 1996 must be conducted in accordance with the applicable rules of Subsections IWE and IWL of ASME Section XI, 1992 Edition with the 1992 Addenda.

Immediate compliance with the repair and replacement rules of ASME Section XI, 1992 Edition with the 1992 Addenda for IWE components is impractical because substantial time and resources must be expended for the following major efforts:

RELIEF REQUEST: CR-19
(Page 2 of 3)

1. CONTAINMENT STRUCTURE COMPONENT CLASSIFICATION: The Station materials, erection, fabrication procedures and testing of containment structures at LaSalle County are in general conformance to the following rules;
 - a. Containment steel liner, backed by concrete, containment steel boundaries, not backed by concrete, and penetrations were constructed to the rules of ASME Section III, Division I, Subsection NE, 1971 Edition with the Summer 1972 Addenda.
 - b. Containment concrete and reinforcing steel was constructed to the rules of ACI-318, 1971 and ASTM A615-1972.
 - c. Containment Post Tensioning System is in general conformance with the rules of ASME Section III, Division II, Subsections CC-2400, CC-4400 and CC-5400, July 1, 1977.
 - d. Containment structural steel was constructed to the rules of AISC Manual-1969.

In order to comply with 10 CFR 50.55a(g)(4)(v), it will be necessary to identify and reclassify all containment components to Class MC and CC classification criteria. This effort will include the retrieval and review of all applicable fabrication and installation documentation, the development of a basis document to identify the correct classification boundaries and the eventual development of an inservice inspection program to govern all IWE/IWL-related activities at LaSalle Station.

2. PROCEDURE REVISIONS: The requirements of Subsections IWE and IWL must be incorporated into applicable station procedures. The current Inservice Inspection program, (which includes the repair and replacement program), for LaSalle Station is currently based on the rules of ASME Section XI, 1989 Edition, and only addresses the inservice inspection requirements for Class 1, 2, and 3 pressure retaining components and component supports. Therefore, various procedures that control Code repair and replacement activities must be revised to incorporate the unique requirements of Subsections IWE and IWL.
3. EXAMINER TRAINING AND CERTIFICATION: The unique examiner qualification required by Subsections IWE and IWL must be incorporated into the existing Commonwealth Edison (ComEd) certification and training program. The existing ComEd certification and training program only addresses the certification requirements for Class 1, 2 and 3 pressure retaining components and component supports. The ComEd certification and training program must be revised to incorporate the unique requirements of Subsections IWE and IWL.

RELIEF REQUEST: CR-19
(Page 3 of 3)

Since the containment structures at LaSalle Station were constructed to the rules of ASME Section III, ACI-318-1971, ASTM A615-1972 and AISC Manual-1969, all repair and replacement activities conducted on these components have been subjected to the ComED Quality Assurance Manual (Commonwealth Edison Company, Topical Report CE-1-A), which implements the requirements of 10 CFR 50, Appendix B. The ComEd Quality Assurance Manual requires repair and replacement activities to be conducted in accordance with the original design specifications using approved procedures. This approach assures applicable design bases are maintained. In addition, the containment structure integrity is verified by periodic pressure tests in accordance with 10 CFR 50, Appendix J, Option B. The application of the requirements of Subsections IWE-4000 and IWL-4000 imposes added administrative burden (such as requirement for a repair/replacement plan and NIS-2 form) without providing a compensating increase in the level of quality or safety.

PROPOSED ALTERNATE PROVISIONS

Until December 31, 1997, all repair and replacement activities conducted on Class MC containment structure components at LaSalle Station will be performed in accordance with the existing ComEd QA Program requirements. Compliance with ASME Section XI, 1992 Edition with the 1992 Addenda, Subsections IWE-4000 IWL-4000 will begin on January 1, 1998.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2 until December 31, 1997.