



Commonwealth Edison
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October 2, 1989

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2
LaSalle County Station Units 1 and 2
Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Response to Generic Letter 89-04
NRC Docket Nos. 50-237/249, 50-254/265,
50-295/304, 50-373/374, 50-454/455
and 50-456/457

Reference: Generic Letter 89-04, Guidance on Developing
Acceptable Inservice Testing Programs, dated
April 3, 1989.

Dear Sir:

Generic Letter 89-04 was issued to provide guidance to licensees on frequently identified weaknesses of Inservice Testing (IST) Programs. For those licensees identified as having recently received (or about to receive) a Safety Evaluation Report (SER) on their IST programs, the Generic Letter guidance was provided for use in future amendments of their approved programs. For those licensees who were not identified as having an SER, a confirmation letter verifying compliance with the guidance in the Generic Letter was requested. This letter presents Commonwealth Edison's (Edison's) response to Generic Letter 89-04.

All of the Edison stations have reviewed the guidance provided in the Generic Letter, and have determined that IST Program and implementation procedure revisions are required to conform with the Generic Letter. Since all of the Edison stations, regardless of SER status, are affected by the Generic Letter, a response is provided for each station. Attachments "A" through "F" of this letter provides a status of the efforts at Dresden, Quad Cities, Zion, LaSalle County, Byron and Braidwood Stations, respectively.

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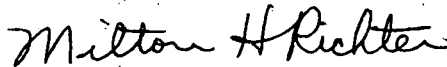
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For any Edison station where conformance with the guidance presented in the Generic Letter is not practical to implement, alternative methods may be established, or possibly, relief may be requested if not already permitted by previously approved relief requests.

At this time it is Edison's understanding that only LaSalle County and Quad Cities Stations are required to submit confirmation letters. LaSalle Station has recently concluded a revision to its IST Program based on the guidance presented in the Generic Letter. This IST Program revision is being submitted under a separate transmittal (October 2, 1989). Quad Cities Station is presently performing an extensive review on the scope of their IST Program based on the the guidance in the Generic Letter. An IST Program revision will be submitted at a later date (February 28, 1990).

Please direct any questions that you have on this response to this office.

Respectfully,



M.H. Richter
Generic Issues Administrator

Attachments: A - Dresden Station
B - Quad Cities Station
C - Zion Station
D - LaSalle County Station
E - Byron Station
F - Braidwood Station

cc: A.B. Davis
Resident Inspectors - D/QC/Z/LSC/BY/BW

ATTACHMENT A

DRESDEN STATION

Prior to the issuance of Generic Letter 89-04, Revision 2 of the Dresden Station Inservice Testing (IST) Program had been submitted (May 1988) to the NRC for review. In May 1989, a site meeting was conducted with the NRC to resolve any concerns with Revision 2 of the IST Program. The discussions during the site meeting took into account the guidance/positions provided in the Generic Letter. Following the site meeting, Revision 3 of the Dresden IST Program, which incorporated the resolution of the NRC concerns, was submitted on July 12, 1989. It is Edison's understanding that the NRC now considers Dresden Station a "Table 1" plant, that is, a plant which will be issued a Safety Evaluation in the near future.

Procedure revisions are in progress to implement Revision 3 of the IST Program (which includes the guidance/positions presented in the Generic Letter). The procedure revisions primarily apply to check valve testing (full flow, back flow, disassembly) associated with positions presented in the Generic Letter, and pump and valve testing identified in the site meeting. Additionally, procedure revisions will be performed, if necessary, to reflect any changes in the limiting values of full-stroke times for power operated valves. It is expected that the revisions to the implementation procedures will be completed by February 28, 1990.

ATTACHMENT B

QUAD CITIES STATION

In February 1983, Revision 2 of the Quad Cities Station Inservice Testing (IST) Program was submitted to the NRC for review. Interim approval was granted, however, no Safety Evaluation Report was received prior to issuance of Generic Letter 89-04. The Generic Letter has been reviewed for its impact on Revision 2 of the IST Program and associated procedures. Based on that review, it has been determined that revisions to the IST Program and implementation procedures are necessary to incorporate the guidance/positions presented in the Generic Letter.

At this time, an extensive review is being performed on the scope of the IST Program, which includes an evaluation of the safety function of all valves associated with the IST Program. Upon conclusion of the program scope review (expected by the middle of October 1989), the IST Program and implementation procedures will be revised to ensure conformance with the guidance/positions presented in the Generic Letter. It is expected that the Generic Letter guidance on check valve testing (full flow, back flow, disassembly) will result in the largest number of implementation procedure revisions. In the event conformance with the guidance/positions presented in the Generic Letter is not practical to implement, alternative methods may be established, or possibly, relief may be requested if not already permitted by previously approved relief requests.

It is expected that the revisions to the IST Program and implementation procedures will be completed by February 28, 1990. At that time, the IST Program will be submitted to the NRC for review.

Edison believes this response, coupled with the upcoming submittal of the IST Program revision, will fulfill the confirmation letter requirement for Quad Cities Station (which was not listed on Tables 1 or 2 of the Generic Letter).

ATTACHMENT C

ZION STATION

Generic Letter 89-04 has been reviewed for its impact on the Zion Station Inservice Testing (IST) Program. Based on that review, it has been determined that revisions to the IST Program and implementation procedures are necessary to incorporate the guidance/positions presented in the Generic Letter.

Prior to the issuance of Generic Letter 89-04, an independent review of the Zion Station IST Program was being performed to ensure compliance to the code requirements with respect to valve testing. Upon issuance of the Generic Letter, the scope of the review was expanded to include the guidance presented in position 11 of the Generic Letter. At this time, it is expected that the independent review of the IST Program will be completed by the end of December 1989. Once the expanded scope of the IST Program has been defined, the program and implementation procedures will be revised as necessary to conform with the guidance/positions presented in the Generic Letter. It is expected that the Generic Letter positions regarding check valve testing (full flow, back flow, disassembly) will result in the largest number of implementation procedure revisions, and the Generic Letter position regarding program scope will require the development of new implementation procedures. In the event conformance with the guidance/positions presented in the Generic Letter is not practical to implement, alternative methods may be established, or possibly, relief may be requested if not already permitted by previously approved relief requests.

It is expected that the revisions to the IST Program and implementation procedures will be completed by August 31, 1990. At that time the IST Program will be submitted to the NRC for review.

ATTACHMENT D

LASALLE COUNTY STATION

In August 1988, Edison received a Safety Evaluation Report granting approval of the LaSalle County Station Inservice Testing (IST) Program (Revision 0) with the exception of eleven (11) anomalies. These anomalies were addressed and a revised IST Program (Revision 1) was submitted on November 16, 1988. Prior to NRC response on Revision 1 of the IST Program, Generic Letter 89-04 was issued. The Generic Letter has been reviewed for its impact on Revision 1 of the IST Program and associated procedures. Based on that review, LaSalle County Station has revised its IST Program (Revision 2). Revision 2 of the IST Program will be submitted under a separate transmittal on October 2, 1989.

Procedure revisions are in progress to implement Revision 2 of the IST Program. The procedure revisions are primarily associated with the guidance/positions presented in the Generic Letter on check valve testing (full flow, back flow, disassembly), and on the limiting values of full-stroke times for power operated valves. It is expected that the revisions to the implementation procedures will be completed by February 28, 1990.

Edison believes this response, coupled with the submittal of Revision 2 of the IST Program, fulfills the confirmation letter requirement for LaSalle County Station (which was not listed on Tables 1 or 2 of the Generic Letter).

ATTACHMENT E

BYRON STATION

The Byron Station Inservice Testing (IST) Program for pumps (Revision 6) and valves (Revision 7) received a Safety Evaluation Report (SER), with the exception of eight (8) anomalies, in September 1988. These anomalies were addressed and a revised IST Program (Revision 7 for pumps and Revision 8 for valves) was submitted on December 21, 1988. Prior to NRC response on the IST Program revision, Generic Letter 89-04 was issued, indicating Byron Station as a plant with an SER issued on its IST Program. The Generic Letter has been reviewed for its impact on Revision 7/8 of the IST Program and associated procedures. Based on that review, it has been determined that revisions to the IST Program and implementation procedures are necessary to incorporate the guidance/positions presented in the Generic Letter.

At this time it is expected that Generic Letter guidance on check valve testing (full flow, back flow, disassembly) and the limiting values of full-stroke times for power operated valves will result in the largest number of implementation procedure revisions. The design accident flows and safety functions for all of the check valves associated with the IST program are presently being confirmed in order to address the positions of the Generic Letter on check valve testing. Upon completion of this confirmation effort (expected by the middle of October 1989), current check valve test procedures will be evaluated for adequacy and revisions will be implemented where necessary, and practical, to perform the required testing. In the event the required testing is not practical to perform, alternative testing methods may be established, or possibly, relief may be requested if not already permitted by previously approved relief requests. Additionally, the limiting values of full-stroke times for power operated valves are being evaluated, and any procedure revisions will be performed as necessary.

It is expected that required revisions to the implementation procedures will be completed by April 30, 1990. If NRC comments are received by February 1, 1990 on IST Program revision 7/8, those comments can be incorporated into the April 30, 1990 revision of the IST Program.

ATTACHMENT F

BRAIDWOOD STATION

In January 1989, Revision 4 of the Braidwood Station Inservice Testing (IST) Program was submitted to the NRC for review. Prior to NRC response on Revision 4 of the IST Program, Generic Letter 89-04 was issued, indicating Braidwood Station as a plant which would be issued a Safety Evaluation Report in the near future. The Generic Letter has been reviewed for its impact on Revision 4 (and revision to relief request VR-12, submitted in Revision 4A) of the IST Program and associated procedures. Based on that review, it has been determined that revisions to the IST Program and implementation procedures are necessary to incorporate the guidance/positions presented in the Generic Letter.

At this time it is expected that Generic Letter guidance on check valve testing (full flow, back flow, disassembly) and the limiting values of full-stroke times for power operated valves will result in the largest number of implementation procedure revisions. The design accident flows and safety functions for all of the check valves associated with the IST program are presently being confirmed in order to address the positions of the Generic Letter on check valve testing. Upon completion of this confirmation effort (expected by the middle of October 1989), current check valve test procedures will be evaluated for adequacy and revisions will be implemented where necessary, and practical, to perform the required testing. In the event the required testing is not practical to perform, alternative testing methods may be established, or possibly, relief may be requested if not already permitted by previously approved relief requests. Additionally, the limiting values of full-stroke times for power operated valves have been evaluated, and procedure revisions are being performed as necessary.

It is expected that required revisions to the implementation procedures will be completed by February 28, 1990. If NRC comments are received by December 1, 1989 on IST Program revision 4(4A), those comments can be incorporated into the February 28, 1990 revision of the IST Program.