



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 12, 1990

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

Subject: Dresden Station Units 2 and 3
Braidwood Station Units 1 and 2
Revised Schedule for Implementation of
Generic Letter 89-04 Guidance
NRC Docket Nos. 50-237/249 and 50-456/457

References: (a) Generic Letter 89-04, dated April 3, 1989.
(b) M. Richter letter to U.S. NRC, dated
October 2, 1989.
(c) Minutes of the Public Meetings on Generic
Letter 89-04, dated October 25, 1989.

Dear Sir:

Generic Letter 89-04 (Generic Letter) was issued to provide guidance to licensees on frequently identified weaknesses of Inservice Testing (IST) Programs. As reported in Reference (b), all of Commonwealth Edison Company's (CECo) nuclear stations required IST Program and implementation procedure revisions to conform with the guidance/positions provided in the Generic Letter. Additionally, Reference (b) provided a schedule for the completion of these actions for each station. This letter presents a revised schedule for Dresden and Braidwood Stations.

Reference (b) indicated for Dresden Station that procedure revisions were in progress to implement Revision 3 of the IST Program (which included the guidance/positions presented in the Generic Letter). This effort was expected to be completed by February 28, 1990. While revising the procedures, it was determined that further evaluation was needed on the flow instrumentation associated with some of the check valve tests (full-flow tests). Therefore, additional time will be required to complete all of the procedure revisions. It is expected that all implementation procedure revisions associated with Revision 3 of the IST Program will be completed by June 29, 1990. At this time it is CECo's understanding that Dresden Station, which is considered a "Table 1" plant, will be receiving a Safety Evaluation Report (SER) in the near future for Revision 3 of the IST Program.

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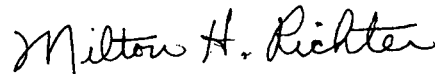
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Reference (b) indicated for Braidwood Station that the IST Program and implementation procedure revisions necessary to conform with the guidance/positions in the Generic Letter were expected to be completed by February 28, 1990. At that time, the IST Program revision was to be submitted for NRC review. Although substantial progress has been made on the implementation procedure revisions, this effort was not completed prior to the beginning of the Spring (March) 1990 refueling outage for Unit 2. Since a refueling outage places a high demand on a station's personnel resources, it is now expected that the remaining procedure revisions will be completed by June 29, 1990. Regarding the IST Program revision, it is CECO's understanding that Braidwood Station, which is identified as a "Table 1" plant in the Generic Letter, will be receiving an SER in the near future. Based on recent discussions with the NRC, and CECO's understanding of the guidance in Reference (c), an IST Program revision necessitated by the guidance/positions in the Generic Letter for a "Table 1" plant may be submitted after receipt of the SER. Therefore, the Braidwood Station IST Program revision will be submitted within 90 days of receipt of the SER.

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

Respectfully,



M.H. Richter
Generic Issues Administrator

cc: A.B. Davis - Regional Administrator, Region III
Resident Inspectors - D/BW
P. Eng - NRR
S. Sands - NRR

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