



Commonwealth Edison
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July 23, 1980

Mr. Richard Snaider
Generic Issues Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Commonwealth Edison Co.
Comments on NUREG-0619

Reference (a): D. G. Eisenhower letter to All BWR Licensees
dated June 5, 1980

Dear Mr. Snaider:

The following are Commonwealth Edison's comments on
NUREG-0619, which was transmitted by Reference (a).

I. Feedwater Nozzles

In general Commonwealth Edison concurs with the conclusion
on the effectiveness of the General Electric Clad removal and
improved design sparger replacement program. Based on this the
company has already embarked on a program to implement this "final
fix".

The urgency for implementation of the feedwater low flow
controller and RWCU reroute system changes is not readily apparent.
They do provide extra margin for crack propagation but the proposed
NUREG inspections seem to be based on stress analyses which provide
for seal refurbishment to obtain plant life usage factors less than
1. Since the usage factor increases significantly only with seal
leakage, it is felt that if seal refurbishment was performed as
required or if it can be shown that there is no seal leakage through
the use of a temperature monitoring system the system changes would
not be necessary.

Also, due to the fact that planning for such system changes
has not begun, it is not possible to complete these changes on all
the units by the required date.

Table 2 on page 18 is unclear for the specified inspection
intervals. The words "or startup/shutdown cycles" should be the
only ones enclosed by parentheses or should be enclosed by an
additional set of parentheses.

II. Control Rod Drive Return Line Nozzle

The proposed NUREG permits valving out of the return line
without capping the nozzle only as an interim measure. It does,

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however, allow for rerouting the return line and operating with the rerouted line isolated with certain system modifications performed. Both options require additional nondestructive examinations. It is felt that there are not sufficient differences between the two options to rule out the former. Commonwealth Edison is not yet convinced that the system modifications such as the installation of the pressure equalizing valves are warranted. If required to perform these modifications it is felt that the current operating mode (the original return line valved out) along with the system changes is sufficient.

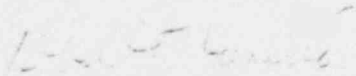
A dye penetrant examination is required of the inner radius and bore of the nozzle and the area below the nozzle at the time the nozzle is capped. We believe this requirement is also satisfied on units which were examined at the time their return lines were valved out. It is felt that since the cause of the thermal cycling has been eliminated prior to the nozzles being examined, additional examinations, if required to the cap the nozzle, are not warranted.

Non-destructive examination of stagnant lines is also required. Based on the history of stress Corrosion Cracking it is felt that only testing of stagnant stainless steel lines need be performed.

Finally, based on previous NRC correspondence informing utilities not to act until the NUREG is issued in final form, no additional system changes have been planned. If rerouting of the CRD return line and/or performing the other system changes is required, approximately 1 year will be required for engineering and material procurement. Therefore, it is not possible to complete these modifications by December 31, 1981.

As stated above it is felt that the system changes for both the Feedwater and Control Rod Drive systems can not be implemented by the proposed dates. At this time, considering the outage schedules for the plants involved, June 1983 appears to be the earliest date that all modifications could be implemented for our units.

Very truly yours,


Robert F. Janecek
Nuclear Licensing Administrator
Boiling Water Reactors