

ENCLOSURE

Q421.19. We have reviewed Appendices A and B to the Byron/Braidwood FSAR. Although Appendix A states full compliance with the requirements of the Regulatory Guide 1.94, its Supplement, Appendix B contains several deviations from the present positions of the Regulatory staff. Examples of these deviations are:

Appendix B

Regulatory Staff

Section B.1.2.6

The contents of chloride ion in mixing water and ice did not exceed 500 ppm.

ASME Boiler and Pressure Vessel Code Section III Division 2, CC-2223.1 states that maximum chlorides as CL should be 250 ppm.

Table B.1-4

Frequency of testing of concrete for compressive strength for Category I structures other than containment was one from every 150 cu. yd. or each day of less than 150 cu. yd.

R. G. 1.142 refers to ANSI Standard N45.2.5-74 which requires that the tests be performed every 100 cu. yd. or a minimum 1 set/day for each class of concrete.

Section B.1.3.3

It appears that the adjustment of design mixtures is not in accordance with the commonly accepted method specified in the ACI-214. The applicant should be requested to provide a reference which contains the two equations used and relate these equations to those contained in the ACI-214.

As stated, the above paragraphs are only examples of deviations we have noted. Regulatory Guide 1.94 states the NRC position relative to the accepted industry standard ANSI N45.2.5-1974. Please identify all deviations from Regulatory Guide 1.94 and modify Appendices A and B of the FSAR to demonstrate compliance. Should you elect to adopt an alternative method of complying with any part of the above, we request you specifically identify the particular section of the regulatory guide or ANSI standard you are taking exception to and describe your alternatives in sufficient supporting detail to provide a basis for acceptance and for review by the staff.

POOR ORIGINAL

8103250177

421.20

Our review of the proposed Amendment 28 exceptions to Regulatory Guide 1.58 in Appendix A of the Byron/Braidwood Station, Unit Nos. 1 & 2 FSAR indicate these exceptions are not totally acceptable under present review guidance.

Enclosed for your information and use is a copy of Regulatory Guide 1.58, Revision 1, dated September 1980, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel." Regulatory Guide 1.58 endorses ANSI N45.2.6 with certain exceptions. As indicated in section D of this regulatory guide, regulatory positions C.5, 6, 7, 8, and 10, which provide additional guidance concerning the qualification of nuclear power plant inspection, examination, and testing personnel, should be implemented by all operating nuclear plants and those under construction by no later than January 30, 1981.

The NRC staff has determined that the aforementioned schedules for implementation for this regulatory guide is necessary to provide increased assurance that inspection, examination, and testing personnel are properly qualified for work presently underway.

Therefore, it is our position that you provide the following information:

1. Commitments to meet regulatory positions C.5, 6, 7, 8, and 10 of Regulatory Guide 1.58, Revision 1 or provide justification for not doing so.
2. Alternative methods of complying with 10 CFR Part 50, Appendix B regarding qualification of nuclear power plant inspection, examination, and testing personnel, and commitments to institute these methods or provide justification for not doing so, if you elect not to adopt the methods given in Regulatory Guide 1.58, Revision 1.

3. A description of the present qualifications of your inspection, examination, and testing personnel relative to regulatory positions 5, 6, 7, 8, and 10 of Regulatory Guide 1.58, Revision 1, or the alternative methods you have elected to adopt, and your plans for upgrading the qualifications of these personnel to meet the recommended levels.