

Docket File



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

November 19, 1991

Docket Nos. STN 50-454, STN 50-455  
STN 50-456, STN 50-457

Mr. Thomas J. Kovach  
Nuclear Licensing Manager  
Commonwealth Edison Company-Suite 300  
OPUS West III  
1400 OPUS Place  
Downers Grove, Illinois 60515

Dear Mr. Kovach:

We have reviewed your letter of November 15, 1991, requesting a Temporary Waiver of Compliance (TWOC) for Braidwood, Unit 1, and Byron, Units 1 and 2, from Technical Specification (TS) 3.8.1.1, Action statement e., and for Braidwood, Unit 2, from the TS Action statement 3.8.1.2 requirements to depressurize and vent the Reactor Coolant System.

Braidwood, Unit 1, and Byron, Units 1 and 2, were in Mode 1 and Braidwood, Unit 2, was in Mode 5. The TS requires two emergency diesel generators (EDGs) be operable while in Modes 1 through 4 and one EDG operable while in Modes 5 and 6. The TSs require that when in Mode 1 while two EDGs are inoperable, one EDG is to be made operable within 2 hours or be in at least HOT STANDBY within the next 6 hours. When in MODE 5 with less than one EDG operable, immediately suspend all operations involving core alterations, positive reactivity changes, movement of irradiated fuel, or crane operation with loads over the spent fuel pool, and within 8 hours, depressurize and vent the Reactor Coolant System through at least a 2 square inch vent. Also, when in Mode 5 with the reactor coolant loops not filled, immediately initiate corrective action to restore at least one EDG as soon as possible.

The basis for your request was that on Thursday, November 14, 1991, at 3:05 p.m. for Byron, Units 1 and 2, and at 3:10 p.m. for Braidwood, Units 1 and 2, the EDGs were declared inoperable. Following the EDSFI at the LaSalle Station, Commonwealth Edison Company (CECo) addressed the surveillance requirements for a bus undervoltage condition for several feeder and cross-tie circuit breakers at Byron and Braidwood. Technical Specification Surveillance Requirement 4.8.1.1.2.f.4a requires verifying deenergization of the ESF busses and load shedding from the ESF busses. It was discovered that these breakers were never tested for an undervoltage condition and that no test documentation or test procedures existed. The affected circuit breakers are the normal or alternate Station Auxiliary Transformer (SAT) feed breakers and the ESF to non-ESF cross-tie breakers.

You requested 48 hours from 3:00 p.m. on November 14, 1991, before any of the units would be required to comply with the applicable TS requirements. This

request was to avoid (1) increased pressures on plant staff to complete the surveillance which could have led to errors resulting in an abnormal occurrence, and (2) a transient condition involving potential plant upsets that would require demand for the system when the system is removed from service for testing. This waiver would also avoid an unnecessary thermal cycle on Byron, Units 1 and 2, and Braidwood, Unit 1, should you be able to prove the EDGs operable within that time period. The TWOC was granted at 6:45 p.m. (CST) on November 14, 1991, to commence at 3:00 p.m. on November 14, 1991, for 48 hours. If the problem with the breakers had not been corrected and at least one EDG had not successfully passed its operational surveillance test, actions would have been taken to shut down Byron, Units 1 and 2, and Braidwood, Unit 1, in a timely manner. Compliance with TS 3.8.1.2 would have been established for Braidwood, Unit 2.

I understand that during the effective period of time that the TWOC was in effect, Braidwood and Byron Stations took the following compensatory measures to ensure that the units were maintained in a safe and stable condition:

- No electrical distribution equipment, either normal, standby or reserve, would be unnecessarily taken out of service on any unit.
- No switchyard activities which could perturb the offsite power sources would be allowed.
- No Fire Protection activities which could result in a transformer deluge actuation would be scheduled.
- The Load Dispatcher was notified to maximize the availability of the offsite power lines servicing Braidwood/Byron.
- The Shift Management would review all surveillances and out-of-services for impact prior to authorizing the initiation of the activity.
- Byron, Units 1 and 2, and Braidwood, Unit 1, would be removed from EGC for the duration of this waiver.
- Division OAD would be notified to refrain from work activities in the switchyards for the duration of this waiver.
- All operating personnel would be notified via Daily Order to:
  - a) Ensure these measures remain in effect for the duration of this waiver.
  - b) Trip the SAT feed breaker should an undervoltage condition occur without the diesel generator breaker closing.
  - c) Not perform any unnecessary surveillances which utilize the ESF and non-ESF crosstie breakers.

November 19, 1991

We agree that the diesel generator train's undervoltage interlocks should be included in the Byron/Braidwood stations' surveillance program and will be performed on an 18-month frequency.

I granted the requested relief with Region III concurrence at 6:45 p.m. (CST) on November 14, 1991, based on a thorough discussion with the CECO management team for Byron and Braidwood, Region III, and the NRR staff, to commence on November 14, 1991, at 3:00 p.m. and continue for 48 hours. This approval was contingent on the compensatory measures described above. The Temporary Waiver of Compliance was terminated at Byron, Units 1 and 2, at 1:28 p.m. (CST) and at Braidwood, Units 1 and 2, at 5:45 p.m. (CST) on November 15, 1991, when one EDG of each unit was declared operable.

Sincerely,

Original Signed By:

John A. Zwolinski, Assistant Director  
for Region III Reactors  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

cc: See next page

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EGreenman  
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*Based on  
resolution of  
written comments*

Mr. Thomas J. Kovach  
Commonwealth Edison Company

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November 12, 1991

Docket No. 50-344

Mr. James E. Cross  
Vice President, Nuclear  
Portland General Electric Company  
121 S.W. Salmon Street  
Portland, Oregon 97204

Dear Mr. Cross:

SUBJECT: NRC GENERIC LETTER (GL) 89-13, "SERVICE WATER SYSTEM PROBLEMS  
AFFECTING SAFETY-RELATED EQUIPMENT," DATED JULY 18, 1989  
(TAC NO. 74075)

By letter dated October 1, 1990, Portland General Electric Company submitted the second of two required responses to the subject generic letter for the Trojan Nuclear Plant. You have implemented each of the five recommended actions of GL 89-13, or an equally effective alternative course of action for one or more of them. Your response fulfills the reporting requirements of the generic letter. This item is closed.

We remind you that, if a licensee or applicant chooses a source of action different from the recommended actions of the generic letter, the licensee or applicant should document and retain in appropriate plant records a justification that the heat removal requirements of the service water system are satisfied by use of the alternative program.

Sincerely,

Original signed by

Lawrence E. Kokajko, Project Manager  
Project Directorate V  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

cc: See next page

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Sincerely,

A handwritten signature in dark ink, appearing to read "L. E. Kokajko", is written over a horizontal line.

Lawrence E. Kokajko, Project Manager  
Project Directorate V  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

cc: See next page

Mr. James E. Cross  
Portland General Electric Company

Trojan Nuclear Plant

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