



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 3, 1993

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2
Response to Unresolved Item
Inspection Report Nos. 50-456/93011; 457/93011
NRC Docket Numbers 50-456 and 50-457

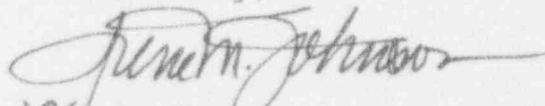
Reference: (a) G. C. Wright letter to L. O.
DelGeorge dated June 10, 1993, transmitting
NRC Inspection Report
50-456/93011; 50-457/93011

(b) R. J. Barrett letter to T. J. Kovach
dated October 15, 1991, "Safety Evaluation
of the Inservice Testing (IST) Program for
Pumps and Valves for Braidwood Station,
Unit Nos. 1 and 2"

Enclosed is Commonwealth Edison Company's (CECO) response to the Unresolved Item which was transmitted with reference (a). The Unresolved Item cited a concern in the area of the Inservice Testing Program requiring a written response. CECO's response is provided in the attachment.

If your staff has any questions or comments concerning this letter, please refer them to Denise Saccomando, Compliance Engineer at (708) 663-7285.

Sincerely,


D.L. Farrar
Nuclear Regulatory
Services Manager

Attachment

cc: J. B. Martin, NRC Regional Administrator - RIII
R. R. Assa, Project Manager - NRR
S. Du Pont, Senior Resident Inspector

09-116

9308090348 930803
PDR ADDCK 05000456
0 PDR

JE01

ATTACHMENT

RESPONSE TO UNRESOLVED ITEM
INSPECTION REPORT 50-456/93011; 50-457/93011

UNRESOLVED ITEM (456(457)/93011):

The licensee's interpretation of IWV-3413 for stroke timing power operated valves indicated that stroke timing was only required in one direction, even if the valve had a safety function in both directions. The NRC interpreted this Code section to require stroke timing in both directions. This was based on the clarification of the Code section in OM-10, "Inservice Testing of Valves in Light-Water Reactor Power Plants," and the NRC's response to question 41 in the meeting minutes for GL 89-04, dated October 25, 1989.

The licensee had not committed to agree with the NRC's interpretation prior to the exit. No specific examples were identified in the inspection sample where compliance with this issue was questioned, although several valves identified in paragraph 2.a have safety functions in both directions. This will be considered an unresolved item pending licensee review and response to compliance with the Code requirement.

RESPONSE:

Braidwood Station is committed to ASME Section XI, Summer 1983 Addenda, for implementation of the Inservice Testing (IST) Program. Braidwood interprets Code Paragraph IWV-3412, "Exercising Procedure," as requiring the exercising of valves in both directions for those valves which have safety functions in both directions. Valves with safety functions in both directions are exercised in both directions in accordance with the IST Program.

However, the ASME Section XI, Summer 1983 Addenda, does not clearly state any requirement for owners to stroke time the subject valves in both directions. Paragraph IWV-3413, "Power Operated Valves," states, "The limiting value of full-stroke time of each power operated valve shall be specified by the owner." Braidwood has interpreted this as requiring stroke timing in one direction.

Since Braidwood's IST program was approved, ASME Section XI, Subsection IWV, has been revised to reference ANSI/ASME OM Part 10, which clarifies the requirements regarding stroke timing valves in both directions. Therefore, as an enhancement, each power operated valve in the Program will be reviewed to determine if it has a safety function in both directions. For those valves identified as having a safety function in both directions, reference values will be determined for the timing requirements and appropriate procedures will be revised. This action will be completed by the beginning of the fourth refueling outage for Unit 2 which is currently scheduled to begin on September 10, 1994.