

NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 14, 1995

Docket File 50-454/455

Mr. D. L. Farrar, Manager Nuclear Regulatory Services Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove, IL 60515

SUBJECT: INSERVICE INSPECTION PLAN FOR PRESSURE TESTING RELIEF REQUEST-

BYRON STATION, UNITS 1 AND 2 (TAC NOS. M90326 AND M90327)

Dear Mr. Farrar:

By letter dated August 29, 1994, Commonwealth Edison (ComEd) requested approval of proposed modifications to the inservice inspection requirements. The proposed changes incorporate Relief Request HR-1, "Alternate Hydrostatic Pressure Test Requirements for ASME Class 1, 2, and 3 Repaired or Replaced Components," Relief Request HR-2, "Alternate Rules for 10 Year Hydrostatic Pressure for Class 3 Systems," and Technical Approach and Position, SP-06, "Adoption of Regulatory Guide 1.147 Approved Code Cases."

We, with technical assistance from the Idaho National Engineering Laboratory (INEL), reviewed and evaluated the information provided in the submittal. Based on the information submitted, the staff adopts the contractor's conclusions and recommendations presented in their Technical Letter Report. The proposed alternatives contained in Revision Da, Relief Request HR-1 (use of Code Case N-416-1) and Relief Request HR-2 (use of Code Case N-498-1), are authorized pursuant to 10 CFR 50.55a(a)(3)(ii) as compliance with the specified requirements of Section XI would result in hardship and/or unusual difficulty without a compensating increase in the level of quality and safety. Use of N-416-1 is authorized provided that additional surface examinations are performed on the root (pass) layer of butt and socket welds on the pressure retaining boundary of Class 3 components when the surface examination method is used in accordance with Section III. Use of Code Cases N-416-1 and N-498-1 is authorized until such time as these code cases are published in a future revision of Regulatory Guide 1.147. At that time, if it is the intent to continue to implement this code case, ComEd is to follow all provisions in Code Cases N-498-1 and N-416-1 with limitations issued in Regulatory Guide 1.147, if any.

The proposed inclusion of Code Case Table SP-06-1, "Acceptable Code Cases for Byron Station Implementation" in Revision Oa, has not been reviewed because the effect on the program plan has not been evaluated. Consequently, inclusion into the inservice inspection plan is not approved.

Our evaluation and conclusions are contained in the enclosed Safety Evaluation (Enclosure 1). Our contractor's Technical Letter Report is included as Enclosure 2.

Sincerely,

original signed by:

Robert A. Capra, Director Project Directorate III-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454 and STN 50-455

Enclosures: 1. Safety Evaluation

2. Technical Letter Report

cc w/encls: See next page

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Sincerely,

George F. Dick, Jr., Project Manager Project Directorate III-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

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Robert A. Capra, Director

Roberta. Capul

Project Directorate III-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

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cc w/encls: See next page

D. L. Farrar Commonwealth Edison Company

cc:

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