



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

February 27, 1992

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Byron Station Units 1 and 2  
Inservice Testing Program for Valves, Revision 11  
NRC Docket Nos. 50-454 and 50-455

Reference: (a) January 31, 1992 letter from R. Barrett to T. Kovach  
transmitting a NRR SER for the Byron IST Program

Dear Mr. Murley:

The NRC Safety Evaluation Report of Reference (a) formally accepted the majority of the changes for the most recent Byron IST Program Plan major revision, but denied Draft Relief Request VR-18. The relief request was not granted because insufficient justification was provided as a basis for the relief request. Commonwealth Edison Company (CECo) was requested by NRR to provide additional justification as soon as possible.

On January 23, 1992, a conference was held between representatives from Byron Station, Byron Nuclear Licensing, and the NRC. During this conference, NRC concerns with relief request VR-18 and suggestions for its reorganization were discussed. This IST Valve Program revision is being submitted to address these concerns and suggestions. Former Draft Relief Request VR-18 has been divided into seven relief requests, six of which have been provided in this transmittal. The valves of relief request VR-18 were formerly grouped by type of relief and have been re-organized into other relief requests on a system basis.

Four previously existing relief requests have been revised and two new draft relief requests created to include the relief requested in former Draft Relief Request VR-18. The remaining valves of former Draft Relief Request VR-18, for which relief will be requested at a later date, will likely reside in a revision to the existing Relief Request VR-15. Other valves which no longer reside in a Draft Relief Request have either been given a Cold Shutdown test frequency or have been determined to fall under existing program or code allowances. Other changes, primarily administrative in nature, have been made to the program. A more detailed summary of changes made to the valve program is contained in Attachment A. Attachment B contains Revision 11 of the IST Program Plan for Valves. Revision lines in the right hand margin identify each change.

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February 27, 1992

The time the NRC Staff has afforded CECO to comment on the Byron IST program has been sincerely appreciated. Please direct any questions you may have regarding this request to this office.

Respectfully,



Terence K. Schuster  
Nuclear Licensing Administrator

Attachments

cc: A. Hsia, Project Manager, NRR  
W. Kropp, Senior Resident Inspector - Byron  
A. Bert Davis, Regional Administrator - RIII

## ATTACHMENT A

### Table of Contents

1. Made editorial changes to assure that information in the table reflects changes to "Notes" and "Relief Requests" sections (see below).

### Section 4.3 Program Tables

1. Made editorial changes to assure that information in the table reflects changes to "Notes" and "Relief Requests" sections. Also, a typing error was corrected on the test frequency for valves 1/2FW039A to show the correct test mode of "CS".

### Section 4.4 Notes

1. Added Note 36 to explain effect of Generic Letter 90-06 on Pressurizer Relief and Block valves.
2. Added Note 37 to indicate test frequency (cold shutdown) for the backflow test of valves 1/2PR032.
3. Added Note 38 to indicate test frequency (cold shutdown) for the backflow test of valves 1/2PS231A,B
4. Added Note 39 to indicate test frequency (cold shutdown) for the backflow test of valves 1/2SI8968
5. Added Note 40 to indicate test frequency (cold shutdown) for the backflow test of RCS cold leg valves: 1/2SI8815; 1/2SI8818A-D; 1/2SI8819A-D; 1/2SI8900A-D; and RCS hot leg valves: 1/2SI8841A,B; 1/2SI8905A-D, and 1/2SI8949A-D
6. Added Note 41 to indicate test frequency (cold shutdown) for valves 1/2RH8705A,B
7. Added Note 42 to indicate test frequency (cold shutdown) for valves 1/2SI8948A-D.

### Section 4.6 Relief Requests

#### **Relief Request VR-5:**

1. Added Full Stroke Test (CT) check valves 1/2SI8956A-D during refueling outages.

2. Added Backflow Test (BT) for valves 1/2SI8956A-D on the same frequency as Byron Technical Specifications
3. Added information on safety function of these valves
4. Transferred valves 1/2SI8948A-D to cold shutdown (Note 42)

**Relief Request VR-8:**

1. Added Full Stroke (CT) and Backflow (BT) test for check valves 1/2CC9518 and 1/2CC9534 and Backflow (BT) test for check valves 1/2CC9486 at cold shutdown, provided all of the Reactor Coolant Pumps are not in operation
2. Added information on safety function of all valves

**Relief Request VR-9:**

1. Added Full Stroke Test (CT) and Backflow Test (BT) for check valves 1/2CV8113 during cold shutdown, provided all Reactor Coolant Pumps are not in operation
2. Added information on safety function of all valves

**Relief Request VR-10:**

1. Added Backflow Test (BT) for check valves 1/2IA091 during refueling outages
2. Added information on safety function of all valves

**Relief Request VR-18:**

Deleted

**Relief Request VR-22:**

Withdrawn

**Relief Request VR-23:**

New Relief Request:

1. Requests relief to Backflow Test (BT) check valves 1/2RY8046 at cold shutdown, provided all of the Reactor Coolant Pumps are not in operation

2. Requests relief to Backflow Test (BT) check valves  
1/2RY8047 during refueling outages

**Relief Request VR-24:**

**New Relief Request:**

1. Requests relief to Backflow Test (BT) check valves  
1/2WO007A,B during refueling outages

(final)