

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 1, 1995

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: REQUEST FOR RELIEF - BRAIDWOOD STATION, UNITS 1 AND 2 (TAC NOS.

M92120 AND M92121)

Dear Mr. Farrar:

By letter dated April 18, 1995, Commonwealth Edison (ComEd) submitted Revision 3 to the Inservice Inspection (ISI) program for Braidwood Station, Units 1 and 2. The submittal contained the following three relief requests: NR-20 (Unit 1 only), "Examination Category B-D, Item B3.140, Steam Generator Nozzle Inner Radius Examinations and Examination Category C-B, Item C2.22, Nozzle Inner Radius Section Examinations"; NR-21, "Alternative Pressure Test Requirements for Welded Repaired or Replaced Class 1, 2, and 3 Components"; and NR-22, "Alternative Requirements for Class 3 10-Year Hydrostatic Tests."

The NRC, with technical assistance from the Idaho National Engineering Laboratory (INEL), reviewed and evaluated the information provided in the submittal. Our evaluations and conclusions are contained in the enclosed Safety Evaluation with the attached Technical Letter Report (TLR). Based on the information submitted, the staff adopts the contractor's conclusions and recommendations presented in the TLR, and, as set forth below and in the enclosed safety evaluation, grants the requested relief. The proposed alternatives contained in Revision 3, Relief Requests NR-20 (Unit 1 only), NR-21 (use of Code Case N-416-1), and NR-22 (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 the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, would result in hardship and/or unusual difficulties without a compensating increase in the level of quality and safety. Relief Request NR-20 authorization is applicable to Braidwood, Unit 1, only and would allow the licensee to perform periodic visual examinations (VT-2) of steam generator nozzle inner radius sections instead of Code-required volumetric examinations. However, if the examination of similar components at other plants (Byron, Unit 2 and Braidwood, Unit 2) indicate flaws that exceed the applicable acceptance criteria, the licensee will expand its Code-required examinations to include Braidwood, Unit 1, steam generators.

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

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revision of Regulatory Guide (RG) 1.147. At this time, if it is the intent to continue to implement these Code Cases, ComEd is to follow all provisions in Code Cases N-416-1 and N-498-1 with limitations issued in RG 1.147, if any.

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 50-456, STN 50-457

Enclosure: Safety Evaluation

w/attached TLR

cc w/enclosure: see next page

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