



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

January 31, 1992

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

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:

SUBJECT: SAFETY EVALUATION OF THE FIRST TEN-YEAR INTERVAL INSERVICE TESTING PROGRAM FOR PUMPS AND VALVES AND ASSOCIATED REQUESTS FOR RELIEF FOR BYRON NUCLEAR POWER STATION, UNITS 1 AND 2 (TAC NOS. M75575 AND M75576)

The Commonwealth Edison Company (the licensee) submitted the First Ten-Year Interval Inservice Testing (IST) Program for Pumps and Valves and associated requests for relief for the Byron Nuclear Power Station, Units 1 and 2, to the NRC by letters dated December 7, 1990, and May 23, 1991 (Revision 9 for pumps and Revision 10a for valves). The first ten-year interval began September 16, 1985, and ends September 16, 1995, for Unit 1 and began August 21, 1987, and ends August 21, 1997, for Unit 2. The licensee provided additional information and revised relief requests by letters dated July 1, 1991, September 13, 1991 and September 23, 1991 (Revision 9a for pumps and Revision 10c for valves). Revision 10b of valve relief request VR-4 was submitted July 1, 1991 and approved by the staff on August 16, 1991, as an interim relief in time for the Unit 1 B1R04 refueling outage. A summary of the relief request submittals and the approval status is enclosed. The IST program was submitted for review and evaluation of its compliance with the requirements of the 1983 Edition, including the Summer 1983 Addenda, of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) regulations, and plant Technical Specifications.

The staff has reviewed and evaluated the program plan, additional information provided, and requests for relief from some Section XI requirements that you determined to be impractical to perform at the Byron Station. The enclosed Safety Evaluation (SE) relates to relief requests PR-1, PR-2, PR-7, VR-2, VR-18, VR-19, and VR-20 in Revisions 9, 9a, 10, 10a, and 10c of the Byron Station, Units 1 and 2, IST program, submitted in letters dated May 23, 1991, September 13, 1991, and September 23, 1991. Other relief requests contained in these submittals are not addressed in this SE because they have either been evaluated in previously issued SEs dated September 15, 1988, September 14, 1990, and August 16, 1991, or been granted in accordance with the guidelines of Generic Letter (GL) 89-04. During the review of licensee's IST relief requests, the staff identified areas where the licensee did not provide sufficient

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justification for its requests. These areas are addressed in the enclosed SE. Relief request VR-18 can not be granted because the basis provided by the licensee did not include sufficient justification for its request. The licensee should submit the necessary bases to justify this request as soon as possible. Relief requests PR-1, PR-7, VR-2 and VR-19 are granted provided that the changes and actions described in the evaluation sections are made within one year of receipt of this SE.

The staff has determined that granting relief, pursuant to 10 CFR 50.55a(a)(3)(i), (c)(3)(ii) or (g)(6)(i), is authorized by law and will not endanger life or property, or the common defense and security and is otherwise in the public interest. In making this determination the staff has considered the alternate testing being implemented, compliance resulting in a hardship without a compensating increase in safety, and the impracticality of performing the required testing considering the burden if the requirements were imposed.

We conclude that the Byron Nuclear Power Station, Units 1 and 2, First Ten-Year Interval Inservice Testing Program for Pumps (Revision 9) and Valves (Revision 10) with the additional information provided and reliefs granted, or granted with alternative requirements, constitute part of the basis for meeting the requirements of 10 CFR 50.55a(g) and Technical Specification 4.0.5

Sincerely,

Original Signed By:

Richard J. Barrett, Director
Project Directorate III-2
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:

- 1. Summary of Relief Requests
- 2. Safety Evaluation

cc w/enclosure:

See next page

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OC/LFMB	GGrant, EDO	

*See previous concurrence

LA/PDIII-2	*PM/PDIII-2	*EMEB	D/PDIII-3
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OGC
J. L. Hill
1/22/92

Mr. Thomas J. Kovach
Commonwealth Edison Company

Byron Station
Unit Nos. 1 and 2

cc:

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BYRON UNIT 1 & 2 1ST TEN-YEAR 1ST RELIEF REQUESTS

RELIEF REQUEST	REV	SUBMITTED	APPROVED/DENIED
PR-1*	7	12/21/88	9/14/90 A**
	9	5/23/91	
	9a	9/13/91	1/92 A, conditional
PR-2*	9	5/23/91	1/92 A
PR-3	delete	12/21/88	9/14/90 A
PR-4	delete	pre-9/15/88	9/15/88 A
PR-5	9	5/23/91	GL 89-04 A
PR-6	9	5/23/91	GL 89-04 A
PR-7*	9	5/23/91	
	9a	9/13/91, 9/23/91	1/92 A, conditional
VR-1	7	8/31/87	9/15/88 A, conditional
	8	12/21/88	9/14/90 A
	9	12/7/90	
	10a	5/23/91	GL 89-04 A
VR-2*	10a	5/23/91	1/92 A, conditional
VR-3	10a	5/23/91	GL 89-04 A
VR-4	8	12/21/88	9/14/90 A
	10b	7/1/91	8/16/91 A, interim
VR-5	7	8/31/87	9/15/88 A
VR-6	7	8/31/87	9/15/88 A
VR-7	delete	8/31/87	9/15/88 A
VR-8	7	8/31/87	9/15/88 A
VR-9	7	8/31/87	9/15/88 A
VR-10	7	8/31/87	3/15/88 Denied
	8	12/21/88	9/14/90 A
	deleted	8/31/87	9/15/88 A
VR-12	7	8/31/87	9/15/88 Denied
	8	12/21/88	9/14/90 A
	9	12/7/90	
	10a	5/23/91	GL 89-04 A
VR-13	7	8/31/87	9/15/88 A
VR-14	7	8/31/87	9/15/88 A
VR-15	7	8/31/87	9/15/88 partial A
	8	12/21/88	9/14/90 A
VR-16	7	8/31/87	9/15/88 Denied
	8	12/21/88	9/14/90 A
VR-17	7	8/31/87	9/15/88 A
VR-18*	10a	5/23/91	1/92 Denied
VR-19*	10c	9/13/91	1/92 A, conditional
VR-20*	10a	5/23/91	1/92 A
VR-21	9	7/6/90	9/14/90 A till 3/14/91
	9	withdrawn 12/7/90	
VR-22	9	7/6/90	9/14/90 A till outage
			9/14/91 for U1
			2/92 for U2

* Evaluated in SER, 1/92. ** A = Approved.