



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

July 31, 1992

U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Braidwood Nuclear Power Station Unit 1 and 2  
Byron Nuclear Power Station Unit 1 and 2  
Response to Open Item Associated with  
Inspection Report 50-454(455)/92009; 50-456(457)/92009  
MRC Docket Numbers 50-454, 50-455, 50-456, and 50-457

Reference: G. C. Wright letter to Cordell Reed dated  
July 1, 1992, transmitting Inspection Report  
50-454(455)/92009; 50-456(457)/92009

Enclosed is Commonwealth Edison Company's (CECo) response to the subject  
Open Item which was transmitted with the referenced letter.

The Open Item concerned the completion of revisions to the operating  
abnormal procedures which support the EOP's, and the performance of a  
complete verification and validation for the revisions.

If there are any questions or comments regarding this response, please  
contact Sara Reece-Koenig, Compliance Engineer, at 708/515-7250.

Very truly yours,

*P. H. Kovach for*

T.J. Kovach  
Nuclear Licensing Manager

Attachments

cc: A. Bert Davis, Regional Administrator - Region III  
W. J. Kropp, Senior Resident Inspector, Byron  
S. DuPont, Senior Resident Inspector, Braidwood  
A. H. Hsia, Project Manager, NRR  
R. Pulsifer, Project Manager, NRR

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ATTACHMENT A

Response to Open Item 454, 455, 456, 457/92009-01

1. Provide a schedule for completion of revisions to the OAs and the performance of a complete V&V.

The Schedule for completion of the OAs consists of 2 Parts.

PART 1:

Part one will eliminate the existing temporary procedure changes (TPCs) common to both stations by incorporating them into permanent revisions. Validations and verifications will be performed only on the parts of the procedures that are changed. These procedures will be assigned alphanumeric revision designators to indicate that the procedures still require complete revisions. The procedure revisions incorporating the common TPCs will be done by September 30, 1992.

PART 2:

The OAs require major revisions. These OA revisions will be written following the standards in the Procedure Generation Package Writers Guide (PGP). This effort will include the incorporation of the problem files that have been accumulated, plant specific TPCs, and V&V comments. The revisions are being done concurrently with the alphanumeric revisions mentioned in Part 1. These procedures will be exercised on the simulator or "table topped" per the PGP. All local actions within the plant will undergo a walkthrough validation to verify the local actions can be performed as written. The major revisions, including V & V and supporting documentation, will be completed by July 31, 1994.

ATTACHMENT A (Continued)

2. Address failure to incorporate the V&V of the OAs (specifically procedure walkthroughs) into the normal 2-year procedure review cycle. The 2-year review of OAs had been deleted at Braidwood. Procedure walkthroughs did not appear to be part of the existing review effort.

At Byron, the OAs have been and will continue to be reviewed as part of the 2-year review program. If, during the 2-year review process, a review of problem file entries indicates that a revision is required, then the revision will be done with its associated V&V as directed by the applicable administrative procedures.

Braidwood Station had removed the Abnormal Operating Procedures from the 2-year review program because the procedures were used frequently for operator training. Operating Procedure Revision Request forms were routinely generated during the training and were incorporated into the procedures as TPCs or maintained in the problem files for future incorporation. Braidwood will again include the Abnormal Operating Procedures in the Station's existing 2-year review program after the procedures are revised and approved as described in Part 2 above. If, during the 2-year review process, a review of problem file entries indicates that a revision is required, then the revision will be done with its associated V&V as directed by the applicable administrative procedures.