

April 17, 1996

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

Dear Mr. Farrar:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE PRESSURIZER WELD
RELIEF REQUEST - BYRON AND BRAIDWOOD STATIONS (TAC NOS. M95088,
M95089, M95172 AND M95173)

On March 28, 1996, Commonwealth Edison Company submitted Relief Request NR-19,
for the Inservice Inspection Program for Byron and Braidwood Stations. The
submittal requested relief from the requirements to inspect the pressurizer
nozzle welds. During the course of our review, we have identified the need
for additional information. Please provide the information requested in the
enclosed Request for Additional Information (RAI) so that we may continue our
review. This request has been discussed with your staff.

Sincerely,

/s/

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

Docket Nos. STN 50-454, STN 50-455,
STN 50-456, STN 50-457

Enclosure: RAI

cc w/encl: see next page

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D. L. Farrar
Commonwealth Edison Company

cc:

Mr. William P. Poirier, Director
Westinghouse Electric Corporation
Energy Systems Business Unit
Post Office Box 355, Bay 236 West
Pittsburgh, Pennsylvania 15230

Joseph Gallo
Gallo & Ross
1250 Eye St., N.W.
Suite 302
Washington, DC 20005

Michael I. Miller, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Howard A. Learner
Environmental law and Policy
Center of the Midwest
203 North LaSalle Street
Suite 1390
Chicago, Illinois 60601

U.S. Nuclear Regulatory Commission
Byron Resident Inspectors Office
4448 North German Church Road
Byron, Illinois 61010-9750

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Ms. Lorraine Creek
Rt. 1, Box 182
Manteno, Illinois 60950

Chairman, Ogle County Board
Post Office Box 357
Oregon, Illinois 61061

Mrs. Phillip B. Johnson
1907 Stratford Lane
Rockford, Illinois 61107

Byron/Braidwood Power Stations

George L. Edgar
Morgan, Lewis and Bochius
1800 M Street, N.W.
Washington, DC 20036

Attorney General
500 South Second Street
Springfield, Illinois 62701

EIS Review Coordinator
U.S. Environmental Protection Agency
77 W. Jackson Blvd.
Chicago, Illinois 60604-3590

Illinois Department of
Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Commonwealth Edison Company
Byron Station Manager
4450 North German Church Road
Byron, Illinois 61010

Kenneth Graesser, Site Vice President
Byron Station
Commonwealth Edison Station
4450 N. German Church Road
Byron, Illinois 61010

U.S. Nuclear Regulatory Commission
Braidwood Resident Inspectors Office
Rural Route #1, Box 79
Braceville, Illinois 60407

Mr. Ron Stephens
Illinois Emergency Services
and Disaster Agency
110 East Adams Street
Springfield, Illinois 62706

Chairman
Will County Board of Supervisors
Will County Board Courthouse
Joliet, Illinois 60434

Commonwealth Edison Company
Braidwood Station Manager
Rt. 1, Box 84
Braceville, Illinois 60407

Ms. Bridget Little Rorem
Appleseed Coordinator
117 North Linden Street
Essex, Illinois 60935

Document Control Desk-Licensing
Commonwealth Edison Company
1400 Opus Place, Suite 400
Downers Grove, Illinois 60515

REQUEST FOR ADDITIONAL INFORMATION

REGARDING INSERVICE INSPECTION RELIEF REQUEST NR-19

INSPECTION OF PRESSURE NOZZLE WELDS

COMMONWEALTH EDISON COMPANY

BYRON STATION, UNITS 1 AND 2

BRAIDWOOD STATION, UNITS 1 AND 2

DOCKET NOS. STN 50-454, STN 50-455, STN 50-456 AND STN 50-457

1. Compared to other similar plants, the Byron/Braidwood estimates for erecting scaffolding, disconnecting and replacing heater cables and removing and replacing insulation appear high. Are these estimates and the associated dose estimate of 154 man-rem for all four units? Please explain what is involved with disconnecting the heater cables.
2. Can complete volumetric examination of the adjacent nozzle safe-end weld be performed? Can complete volumetric examination of the other pressurizer nozzles be performed? Will the remaining Class 1 nozzle-to-vessel welds and inside radius (IR) sections receive complete volumetric examinations?
3. It is important to understand the potential benefit of removing the insulation (e.g., the percentage of the examinations that could be completed). Therefore, clarification regarding potential coverage with the insulation removed is needed.
 - a. In the "Basis for Relief" it is stated that scanning from the nozzle side is not possible and scanning from the shell side is limited by the heater penetrations and that coverage is limited to 60 percent. Does this estimate include coverage for all four directions?
 - b. For the IR section, it is stated that the geometry is not conducive to typical ultrasonic techniques. It is understood that conventional techniques will not be effective for examining most IR sections and that special techniques employing compound angles must be used to interrogate this region. Has the use of compound angles been considered? What percentage of the Code-required volume can be examined if the insulation were removed?
4. The regulations [10 CFR 50.55a(g)(3)(i)] require that for facilities with construction permits issued on or after July 1, 1974, access to enable the performance of inservice examinations be provided for Class 1 components. It appears that this requirement is not met for the pressurizer surge nozzle. Please explain. What would be required to modify or replace the insulation so that access for examination would be provided?

ENCLOSURE