

Docket File



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

September 10, 1992

Docket Nos. STN 50-456  
and STN 50-457

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 INSERVICE TESTING PROGRAM RELIEF REQUESTS  
VR-4 AND VR-17, BRAIDWOOD STATION, UNITS 1 AND 2 (TAC NUMBERS  
M82841 AND M82842)

The staff has completed a review of Braidwood Station, Units 1 and 2, inservice testing program for valves, relief requests VR-4 and VR-17, contained in a submittal by Commonwealth Edison Company dated June 25, 1992. Our evaluation of these relief requests is provided in the enclosed Safety Evaluation (SE).

The Code of Federal Regulations, 10 CFR 50.55a, requires that inservice testing of certain American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Code and applicable addenda, except where specific written relief has been requested by the licensee and granted by the Commission pursuant to Sections (a)(3)(i), (a)(3)(ii), or (g)(6)(i) of 10 CFR 50.55a. In requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; or (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for its facility. Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," provided alternatives to the Section XI requirements determined to be acceptable to the staff. The SE provides the basis by which the Commission grants relief from the testing requirements which we have determined would be impractical to perform or where

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compliance would result in hardship without a compensating increase in safety provided conditions described in the SE are met.

Sincerely,

Original signed by:  
Robert M. Pulsifer for

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

Enclosure: Safety Evaluation

cc w/enclosure:  
See next page

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\* Please see previous concurrence

OFC	LA:PDIII-2	PM:PCIII-2	C:EMEB	OGC	D:PDIII-2
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DATE	9/10/92	9/10/92	09/01/92	09/02/92	9/10/92

Mr. Thomas J. Kovach  
Commonwealth Edison Company

Braidwood Station  
Units 1 and 2

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