

Docket Nos.: STN 50-454, STN 50-455,
and STN 50-456

FEB 1 1985

Mr. Dennis L. Farrar
Director of Nuclear Licensing
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Farrar:

Subject: Byron/Braidwood - Initial Test Program

In reviewing Chapter 14 of your FSAR through Amendment No. 45, we noted that changes had been made without sufficient information to the previously approved Initial Test Program. Enclosed is a request for additional information on the Initial Test Program. Please provide your response within 10 days of the date of this letter.

If any clarification is needed please contact the Byron Project Manager, Leonard Olshan at (301) 492-7070.

Sincerely,
ORIGINAL SIGNED BY:

B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosure: As stated

cc: See next page

DISTRIBUTION:

Docket File EJordan
NRC PDR RHeischman
L PDR OELD
NSIC ACRS (16)
PRC System LOlshan
LB#1 R/F (2) JStevens
MRushbrook (2)

LB#1:DL
LOlshan:kab
02/1/85

LB#1:DL *jas*
JStevens
02/1/85

[Signature]
LB#1:DL
BJYoungblood
02/1/85

8502120388 850201
PDR ADOCK 05000454
PDR

Mr. Dennis L. Farrar
Director of Nuclear Licensing
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

cc: Mr. William Kortier
Atomic Power Distribution
Westinghouse Electric Corporation
Post Office Box 355
Pittsburgh, Pennsylvania 15230

Joseph Gallo, Esq.
Isham, Lincoln & Beale
1120 Connecticut Ave., N. W.
Suite 840
Washington, D. C. 20036

C. Allen Bock, Esquire
Post Office Box 342
Urbana, Illinois 61801

Thomas J. Gordon, Esquire
Waalder, Evans & Gordon
2503 S. Neil
Champaign, Illinois 61820

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

Mr. Edward R. Crass
Nuclear Safeguards and Licensing
Division
Sargent & Lundy Engineers
55 East Monroe Street
Chicago, Illinois 60603

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

Dr. Bruce von Zellen
Department of Biological Sciences
Northern Illinois University
DeKalb, Illinois 61107

Mr. Julian Hinds
U. S. Nuclear Regulatory Commission
Byron/Resident Inspectors Office
4448 German Church Road
Byron, Illinois 61010

Ms. Diane Chavez
528 Gregory Street
Rockford, Illinois 61108

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

Douglass Cassel, Esq.
109 N. Dearborn Street
Suite 1300
Chicago, Illinois 60602

Ms. Pat Morrison
5568 Thunderidge Drive
Rockford, Illinois 61107

David C. Thomas, Esq.
77 S. Wacker Drive
Chicago, Illinois 60601

Rebecca J. Lauer, Esq.
Isham, Lincoln & Beale
Three First National Plaza
Suite 5200
Chicago, Illinois 60602

FEB 1 1985

BYRON/BRAIDWOOD

-2-

cc: Regional Administrator
U. S. NRC, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

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

Erie Jones, Director
Illinois Emergency Services
and Disaster Agency
110 East Adams
Springfield, Illinois 62705

STAFF POSITIONS AND REQUEST FOR ADDITIONAL INFORMATION

BYRON/BRAIDWOOD STATIONS

INITIAL TEST PROGRAM

(Through Amendment 45)

423.44

- a) Provide the following information test abstracts or expanded justification for their omission in discussion of conformance with Regulatory Guide 1.68, Revision 2, Appendix A:
 - 1.j (22) Post-accident monitoring system
FSAR Subsection 7.5.3.3.9
 - 1.1 (1) Liquid Radwaste Handling System
FSAR Subsection 11.2
 - 1.1 (3) Solid Radwaste Handling System
FSAR Subsection 11.4
 - 5.c.c Gaseous and Liquid Radwaste Systems
FSAR Subsections 11.3 and 11.2
- b) Natural Circulation Tests - Modify the statement of conformance to NUREG-0694, Item I.G.1, as contained in FSAR Appendix E.18 to ensure that each licensed operator receives the training as specified in Item 423.30, Part 4.t.
- c) Provide expanded justification for not performing a Feed-water Heater Bypass test as required by Regulatory Guide 1.68, Revision 2, Appendix A, Part 5.k.k.
- d) MSIV Closure Test - FSAR Appendix A states that this test will not be conducted since "the closure of all MSIV's will result in a turbine trip" and that the "turbine trip test will be performed at 100% power and is a more severe transient." The turbine trip is not a more severe test than the closure of all MSIV's test. Therefore, conduct this test at 100% power (or a lower power level if acceptable justification is provided) in accordance with Regulatory Guide 1.68 or provide acceptable, appropriate technical justification for an exception to the Regulatory Guide.

- 423.45 The response to Item 423.33, Part 12, is not acceptable. Modify the response to this item, FSAR Table 14.2-25, Diesel-Generator, (Appendix A) and the statement of conformance to Regulatory Guide 1.108 (Periodic Testing of Diesel Generator Units Use as Onsite Electric Power Systems at Nuclear Power Plants) as stated in FSAR Appendix A to include all testing as defined in Regulatory Guide 1.108, including positions C.2.a.2, 5, 7, 8 and 9.
- 423.46 The response to Item 423.42, Sub-item 6, is not acceptable. Modify FSAR Table 14.2-72, Water Chemistry, to include testing at approximately 30%, 50%, 75% and 100% reactor power in accordance with Regulatory Guide 1.68, Appendix A, Part 5.a.a.
- 423.47 Modify FSAR Table 14.2-50, Primary Safety and Relief Valves, FSAR Table 14.2-51, Steam Generator Safety and Relief Valves, or other FSAR Chapter 14 test abstracts as appropriate to demonstrate that the capacity of the pressurizer power operated relief valves is consistent with the accident analysis assumptions for both the minimum and maximum conditions. When taking credit for bench tests instead of performing installed capacity checks, technical justification should be provided. Where valves are not tested in-situ with the process fluid, testing should be conducted to verify that discharge piping is clear and will not choke or produce back-pressure affecting set-reset pressures of the valves.
- 423.48 Modify FSAR Table 14.2-85 (Turbine Trip) to initiate the turbine trip by opening of the generator main breaker, or add a test abstract which demonstrates that the dynamic response of the plant is in accordance with design for the case of full load rejection (Regulatory Guide 1.68, Appendix A, Part 5.n.n.).