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April 16, 1996

ComEd

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C 20555

Attn: Document Control Desk

Subject: Additional Information Pertaining to Braidwood Station
Unit 1 Interim Inspection
Braidwood Nuclear Power Station Unit 1
NRC Docket Number 50-456

References:
1. K. Kaup letter to the Nuclear Regulatory Commission dated February 23, 1996, transmitting Additional Information Pertaining to Braidwood Unit 1 Cycle Length

2. D. Saccomando letter to the Nuclear Regulatory Commission dated November 16, 1995, transmitting "Clarification of Braidwood Unit 1 Inspection Data"

In Reference 1, the Commonwealth Edison Company's (ComEd) presented information which concluded that it is appropriate for Braidwood Unit 1 to operate during Cycle 6 for at least a timeframe equivalent to 342 days (at an operating temperature above 500^0F T-Hot). Based upon discussions with the Nuclear Regulatory Commission (NRC), ComEd has carefully considered the appropriateness of the proposed 342 day cycle length. Although we still believe that the information presented in Reference 1 provides sufficient justification, to ensure additional conservatism, Braidwood Unit 1 will shut down to conduct an interim inspection prior to October 15, 1996.

During the October outage for the inspection of the Braidwood Unit 1 steam generator top-of-tube sheet, Braidwood will conduct in-situ pressure testing, which will be used to demonstrate that the Unit 1 steam generator tubes have maintained structural integrity in accordance with Regulatory Guidance 1.121. We believe this information is important because it demonstrates that safety would be maintained under accident conditions.

Braidwood Unit 1 intends to mobilize tube pull equipment during the Spring 1997 refuel outage to meet the interim plugging criteria for support plate indications as discussed in Generic Letter 95-03. ComEd will continue to evaluate the appropriateness of performing tube pulls for circumferential indications during this refueling outage. Performing all necessary tube pulls during the refueling outage would meet the recommended actions of the Generic Letter and would result in overall savings in the areas of radiation exposure, cost and schedule impact. It is estimated that pulling tubes in the Fall would result in an **additional cost** of $357,000 (mobilization of tube pull equipment), 1 to 3 days of

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critical path time, and would result in 5 Rem of exposure. ComEd has concluded that the value of the data obtained from the tube pulls, whether performed in the Fall of 1996 or the Spring of 1997 is the same, and that the cost associated with a Fall tube pull is unnecessary. ComEd believes that the overall benefits of performing the tube pulls in the Spring significantly outweighs the value of having pulled tube data available late in 1996.

ComEd would like to reiterate to the Staff that we have been diligently working with the industry to address all steam generator tube degradation issues. We wish to emphasize the fact that we will continue to work with the industry to efficiently and expeditiously address the circumferential indication leak and burst issue. It is our intent to resolve this issue on an industry basis and plan on implementing recommendations that result from this effort.

As a result of this information ComEd, is revising its commitment as transmitted in Reference 2, is currently planning an October 1996 interim inspection, and continues to evaluate the pulling of tubes with circumferential indications during the Spring refueling outage.

If you have any questions concerning this correspondence please contact Denise Saccomando, Senior Licensing Administrator at (708) 663-7283.

Sincerely,

Karl Kaup
Site Vice President
Braidwood Generating Station

cc: D. Lynch, Senior Project Manager-NRR
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