Memorandum

Date: September 2, 1998

To: R. M. Krich, Vice President Regulatory Services

Subject:

Commonwealth Edison's (ComEd) Request For Delay in Responding to an RAI Regarding Individual Plant Examination of External Events (IPEEE).

Byron Nuclear Power Station, Units 1 and 2 Facility Operating Licenses NPF-37 and NPF-66 NRC Docket Numbers: 50 – 454 and 50-455

Braidwood Nuclear Power Station, Units 1 and 2 Facility Operating Licenses NPF-72 and NPF-77 NRC Docket Numbers: 50 – 456 and 50-457

Reference: ComEd Letter, R. M. Krich to U. S. NRC Document Control Desk, "Request for Additional Information Regarding Individual Plant Examination of External Events", dated September 4, 1998.

We have reviewed the attached ComEd's request (Ref.) to delay our response to the NRC's PAI regarding Individual Plant Examination of External Events (IPEEE) in the areas of Fire. Seismic, High Wind, Flood, and other External Events. it is our understanding that since several of the questions being asked are the same ones being addressed by the Industry Group "Tailored Collaboration Project", which ComEd is part of, it would be prudent to delay our submittal until completion of that project. At that time ComEd would assess the results and incorporate the response into our response.

The Braidwood Station concurs with this response as proposed for ComEd. If there are any questions or comments concerning this letter, please contact T. W. Simpkin, Regulatory Assurance at extension 2980.

Respectfully.

G. K. Schwartz Station Manager Braidwood Station

Gks98028.doc Enclosure cc: D. Chrzanowski

- G. O'Donnell
- T. Simpkin
- D. Green

September 4, 1998

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

> Byron Station, Units 1 and 2 Facility Operating License Nos. NPF-37 and NPF-66 NRC Docket Nos. STN 50-454 and STN 50-455

> Braidwood Station, Units 1 and 2 Facility Operating License Nos. NPF-72 and NPF-77 NRC Docket Nos. STN 50-456 and STN 50-457

Subject: Request for Additional Information Regarding Individual Plant Examination of External Events

References: 1) NRC letter, "Request for Additional Information Regarding Braidwood Individual Plant Examination of External Events (TAC Nos. M83593 and M83594)," dated July 9, 1998.

2) NRC letter, "Request for Additional Information Related to Individual Plant Examination for External Events Submittal for Byron Station, Units 1 and 2 (TAC Nos. M83600 and M83601)," dated July 23, 1998.

(1)

The Nuclear Regulatory Commission (NRC) provided requests for additional information (RAIs) regarding the Braidwood Station, Units 1 and 2, and Byron Station, Units 1 and 2, Individual Plant Examination of External Events (IPEEE) submittals in References 1 and 2. These RAIs concern the Fire, Seismic, High Wind, Flood, and Other External Events areas of the Braidwood Station, Units 1 and 2, and Byron Station, Units 1 and 2, IPEEE submittal reports. The responses for these RAIs were due within 60 days (i.e., September 7, 1998, and September 21, 1998, respectively).

Commonwealth Edison (ComEd) Company has been working towards developing responses to the RAIs. A review of the questions contained within the Fire section of the RAIs has identified that seven of the questions are included in the generic RAIs sent to the Nuclear Energy Institute (NEI) in letters dated December 3, 1997, and June 3, 1998. ComEd is a participant in the Tailored Collaboration Project formed by the Electric Power Research Institute (EPRI) and NEI to address the generic RAI. An aggressive project schedule has been established, by EPRI and NEI, to resolve the issues identified by the NRC in the generic RAI.

Requested

To allow resolution of the issues associated with the generic RAI and completion of the EPRI/NEI project, ComEd requests deferral of submittal of the responses to the RAIs, provided in References 1 and 2, until January 31, 1999. The revised response date for the RAIs will allow a complete response for all of the Fire questions contained in the RAIs, along with the responses to the Seismic, High Wind, Flood, and Other External

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Event RAIs, to be include in a single submittal. ComEd is committing to the following actions.

1. Upon completion of the EPRI/NEI project, ComEd will perform a review of the resolution of the issues in the generic RAI.

2. The additional guidance derived from resolution of these issues will be evaluated for impact on the Braidwood Station, Units 1 and 2, and Byron Station, Units 1 and 2, IPEEE submittals and incorporated into the RAI responses, as appropriate, by January 31, 1999.

Any other actions described in the submittal represent intended or planned actions by ComEd. They are described for the NRC's information and are not regulatory commitments.

Should you have any questions concerning this letter, please contact Mr. D. J. Chrzanowski at (630) 663-7205.

Respectfully,

R. M. Krich Vice President - Regulatory Services

cc: Regional Administrator - NRC Region III NRC Senior Resident Inspector - Braidwood Station NRC Senior Resident Inspector - Byron Station