



Commonwealth Edison

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May 11, 1988

Mr. T. E. Murley
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC. 20555

Attn: Document Control Desk

Subject: Braidwood Unit 2
Environmental Qualification
Bunker Ramo Penetration
NRC Docket No. 50-457

Reference: (a) April 8, 1988 D.R. Muller letter to L.D. Butterfield
(b) April 7, 1988 S.C. Hunsader letter to T.E. Murley
(c) April 15, 1988 F.G. Lentine letter to T.E. Murley
(d) May 5, 1988 C. Reed letter to T.E. Murley

Dear Mr. Murley:

Reference (a) documented the NRC staff's previously established conclusion that the environmental qualification for the Bunker Ramo Instrumentation penetration assembly installed in Braidwood Unit 2 had not been demonstrated to their satisfaction. The NRC staff presented in reference (a), that during the Midland Containment Penetration Environment Qualification (EQ) Test, Insulation Resistance (IR) readings had not been taken at frequencies consistent with IEEE Standard 323-1974.

Reference (b) provided Commonwealth Edison's (Edison) initial request for a temporary exemption from the requirements of 10CFR 50.49(j) as applied to these penetrations, (because Edison believes that appropriate supporting documentation can be obtained to address the NRC staff's concerns). References (c) and (d) provided additional information in support of that request.

Because the NRC staff has taken the position that the Bunker Ramo penetration environmental qualification has not been demonstrated, they have not been able to establish the acceptability of an exemption to 10CFR 50.49(j). Though Edison believes that 10CFR 50.49(j) is the applicable part of the regulation from which to seek an exemption, the current circumstances necessary to obtain NRC staff acceptance lead us to request a temporary exemption from 10CFR 50.49(f) in order to allow for the full power licensing of Braidwood Unit 2 to proceed. The duration of this exemption would be in

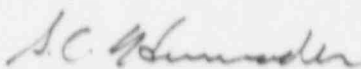
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accordance with the same dates and schedules previously described in references (b), (c), and (d). The technical justifications previously submitted in these references equally apply. Edison intends to continue its efforts to obtain documented information that supports the environmental qualification of this component.

Please address any questions concerning this matter to this office.

Very truly yours,



S. C. Hunsader
Nuclear Licensing Administrator

/klj

cc: S. Sands (NRR)
A. B. Davis (RIII)
Braidwood Resident Inspector

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