Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

April 21, 1986

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Supplemental Response to Generic Letter
83-28 Items 3.2.1 and 3.2.2
NRC Docket Nos. 50-454/455 and 50-456/457

Reference (a): P.L. Barnes to H. R. Denton letter dated
November 5, 1983.

Dear Mr. Denton:

We initially replied to Items 3.2.1 and 3.2.2 of the Generic Letter by submitting reference (a). Your reviewer has requested that we clarify our reply. Attached are revised replies for Braidwood and Byron which should allow the review to be completed.

Please contact this office if there are any further questions on this issue.

Sincerely,

Greg Alexander

Greg Alexander
Nuclear Licensing Administrator

Attachments

cc: J. G. Keppler
Resident Inspectors - BY/BW

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ATTACHMENT 1
BRAIDWOOD STATION

3.2 POST MAINTENANCE TESTING (All Other Safety-Related Components)

1. Licenses and applicants shall submit the results of their review of test and maintenance procedures and Technical Specifications to assure that post-maintenance operability testing of safety-related components in the reactor trip system is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service.

   Response: Braidwood's Conduct of Operation procedure, BwAP 300-1, specifically states:

   "Equipment Return to Service.

   Following maintenance on or modification to a system/component, the Operating Department is responsible for verifying the operable condition of that system/component..."

2. Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required.

   Response: Braidwood currently has an Operating Experience Feedback procedure (BwVP 300-8) which addresses the processing of information from outside sources. This procedure provides for the assessment of the impact on procedures relating to this information. Braidwood also has a Vendor Equipment Technical Information Program, governed by BwAP 1340-5. This program is the vehicle by which information provided by a vendor is evaluated and incorporated into appropriate administrative documents.

Attachment 2
Byron Station

3.2. Post Maintenance Testing (All Other Safety Related Components)

1. Licenses and applications shall submit the result of their of test and maintenance procedures and Technical Specifications to assure that post-maintenance operability testing of safety-related components in the reactor trip system is required to be conducted and that the testing demonstrates that the equipment is capable of performing it safety functions before being returned to service.

   Response: The Station's Out of Service administrative procedure specifically requires that system/components are operable following maintenance on or a modification to them. This is done by a surveillance, special test, or a general inspection. Generally, systems/components not required by Technical Specifications are verified operable by a general inspection. Specific guidelines are given in the Out of Service procedure on what to look for in this inspection.

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