Commonwealth Edison Company 1400 Opus Place Downers Grove, IL 60515-5701

## ComEd

February 24, 1998

U.S. Nuclear Regulatory Commission Washington, DC 20555

Attention: Document Control Desk

Subject:

Byron Station Unit 1 and Braidwood Station Unit 1 NRC Docket Number: 50-454 and 50-456

Commonwealth Edison's Response to NRC letter dated November 13, 1997, regarding 10 CFR 50.72 Notification that Byron 1 and Braidwood 1 are Outside their Design Basis

References:

- M. D. Lynch letter to the Commonwealth Edison Company dated November 13, 1997
- J. Hosmer letter to NRC Document Control Desk dated January 31, 1997, requesting Amendment to the Byron Unit 1 Technical Specifications
- H. Stanley letter to NRC Document Control Desk dated September 2, 1997, requesting Amendment to the Braidwood Unit 1 Technical Specifications
- D. Wozniak letter to NRC Document Control Desk dated July 30, 1997, transmitting Byron Unit 1 Operability Assessment 97-044
- 5) J. Hosmer letter to NRC Document Control Desk dated October 1, 1997, transmitting revised Off-Site Dose Calculations for Byron Unit 1 and Braidwood Unit 1
- M. David Lynch letter to the Commonwealth Edison Company dated March 28, 1997, Extension of the Byron Unit 1, Operating Cycle between Steam Generator Tube Eddy Current Inspection

In the reference 1 letter, the Nuclear Regulatory Commission asked the Commonwealth Edison Company (ComEd) to provide information pertaining to 10 CFR 50.72 notifications that Byron Unit 1 and Braidwood Unit 1 were outside their design basis. The Staff is concerned that the 10 CFR 50.72 notifications appear to contradict our prior finding that the qualitative measures, ComEd



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implemented at Byron Unit 1 and Braidwood Unit 1 reduced to a very low value, the probability of throughwall freespan leakage from circumferential cracks. Therefore, the NRC asked:

- 1. Whether ConcEd has changed its position on "... the probability of throughwall, free span leakage from circumferential cracks."
- Whether ComEd has obtained additional information or performed other analyses that could a. Fect the NRC's evaluation or understanding of ComEd's price proposal to operate Byron Station Unit 1 and Braidwood Station Unit 1 without midcycle eddy current inspections for circumferential crack indications.
- 3. Whether ComEd has conducted a re-review of ComEd's eddy current data from prior inspections that might affect ComEd's prior position that circumferential cracks found in Byron Unit 1 steam generators had taken several cycles to develop.

## **ComEd's Response**

- 1. ComEd has not changed its position on leakage as a result of circumferential cracks. ComEd concurs with the NRC's conclusion that as a result of the detailed inspections conducted during the most recent outages at Byron Unit 1 and Braidwood Unit 1, the probab?" "throughwall, free span leakage due to circumferential cracks in an unlikely event of MSLB is very low.
- 2. ComEd has not obtained additional information or performed additional analyses that would affect ComEd's evaluation or understanding of a basis for full cycle operation for Byron Unit 1 and Braidwood Unit 1 due to circumferential cracks.
- ComEd has not performed any additional re-review of prior inspection circumferential crack indication; at Byron Unit 1 since reviews assessed in your Reference 6 letter.

ComEd included an estimate for circumferential crack leakage during a MSLB, for end of cycle leakage projections performed prior to Fall 1997, as a conservative measure in determining a dose equivalent iodine (DEI) level. This assured compliance with the Technical Specifications for Byron Unit 1 and Braidwood Unit 1, 10 CFR Part 100 and GDC 19. These assessments were submitted to the NRC in References 2 through 5.

## NRC Document Control Desk

-3-

February 24, 1998

It is ComEd's current understanding that it is inappropriate to include any quantitative assessment of leakage due to circumferential cracks in any assessments related to steam generator tube integrity for steam generators in which detailed inspections have been performed, such as those performed on Byron Unit 1 and Braidwood Unit 1. Therefore, ComEd will no longer include the circumferential crack leakage assessment as part of steam generator tube condition monitoring or operational assessment for these units. These conclusions will continue to be evaluated by in-situ testing of indications which meet the selection criteria of the EPRI In-Situ Testing Guideline.

If you have any questions concerning this correspondence please contact this office.

Sincerely,

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Gene Stanley

PWR Vice President

Cc. Byron Project Manager, NRR Braidwood Project Manager, NRR Senior Resident Inspector, Byron Senior Resident Inspector, Braidwood Regional Administrator-RIII Office of Nuclear Safety-iDN