

November 23, 1999

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

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

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

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: NRC Generic Letter 99-02, "Laboratory Testing of Nuclear Grade Activated Charcoal," 180 Day Response

Reference: NRC Generic Letter 99-02, "Laboratory Testing of Nuclear Grade Activated Charcoal," dated June 3, 1999

The purpose of this letter is to provide Commonwealth Edison (ComEd) Company's response to Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear Grade Activated Charcoal," (Reference). This GL requested a written response to four actions within 180 days of the date of the GL (i.e. by November 30, 1999). The GL also noted that if our current Technical Specifications (TS) specifically require laboratory testing of charcoal samples in accordance with the American Society for Testing and Materials (ASTM) Standard D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," protocol at 30 °C [86 °F], and we have been testing in accordance with this protocol, then we need only to address the first requested action. Accordingly, as we test charcoal samples in accordance with ASTM D3803-1989 at all of our operating stations, our response is limited to the first requested action and included as an attachment to this letter.

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Should you have any questions concerning this letter, please contact Mr. J. V. Sipek at (630) 663-3741.

Respectfully,

A handwritten signature in black ink, appearing to read "R. M. Krich". The signature is written in a cursive, flowing style.

R. M. Krich
Vice President – Regulatory Services

Attachment:

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Senior Resident Inspector – Byron Station
NRC Senior Resident Inspector – Dresden Nuclear Power Station
NRC Senior Resident Inspector – LaSalle County Station
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

ATTACHMENT

RESPONSE TO NRC GENERIC LETTER 99-02 “LABORATORY TESTING OF NUCLEAR GRADE ACTIVATED CHARCOAL”

Requested Action

Within 180 days of the date of this generic letter, submit a written response to the NRC describing your current TS requirements for the laboratory testing of charcoal samples for each ESF ventilation system including the specific test protocol, temperature, RH, charcoal bed thickness, total residence time per bed depth, and penetration at which the TS require the test to be performed. If your current TS specifically require laboratory testing of charcoal samples in accordance with the ASTM D3803-1989 protocol at 30 °C [86 °F], and you have been testing in accordance with this standard, then you only need to address this requested action (i.e. no TS amendment or additional testing is requested).

Response

The current Technical Specifications (TS) for Braidwood and Byron Stations, Dresden Nuclear Power Station, LaSalle County Station and Quad Cities Nuclear Power Station control the laboratory testing requirements for charcoal samples of each TS ventilation system. This is summarized in Table 1. For each station, the testing protocol is American Society for Testing and Materials (ASTM) Standard D3803-1989, “Standard Test Method for Nuclear-Grade Activated Carbon,” and the test temperature is 30 °C [86 °F] and we have been testing in accordance with this standard. Relative Humidity (RH) and methyl iodine penetration limits are also identified. No exceptions to ASTM D3803-1989 have been taken. Bed thickness and total residence time per bed depth are not identified and controlled specifically by any of the TS. Based on our review of NRC Generic Letter (GL) 99-02 and the TS and its implementing documents, we have concluded that the concerns of the GL have been previously addressed for our operating stations as specified above, and no TS changes or additional testing is required.

Attachment
ComEd Response To NRC Generic Letter 99-02
“Laboratory Testing of Nuclear Grade Activated Charcoal”

Generic Letter 99-02 Requested Information	Braidwood Station	Byron Station	Dresden Nuclear Power Station	LaSalle County Station	Quad Cities Nuclear Power Station
Applicable Technical Specifications (TS) Note: Specific TS Test Requirements are Provided Below	TS 5.5.11.c, “Ventilation Filter Testing Program”	TS 5.5.11.c, “Ventilation Filter Testing Program”	TS 3/4.7P, “Standby Gas Treatment System” TS 3/4.8.D, “Control Room Emergency Ventilation System”	TS 3.7.2, “Control Room and Auxiliary Electric Equipment Room Emergency Filtration System” TS 3.6.5.3, Standby Gas Treatment System”	TS 3/4.7.P, “Standby Gas Treatment System” TS 3/4.8.D “Control Room Emergency Ventilation System”
TS Required Test Protocol	ASTM Standard D3803-1989	ASTM Standard D3803-1989	ASTM Standard D3803-1989	ASTM Standard D3803-1989	ASTM Standard D3803-1989
TS Required Temperature	30°C	30°C	30°C	30°C	30°C
TS Required Relative Humidity	70% except FHB-95%	70% except FHB-95%	70%	70%	70%
Charcoal Bed Thickness	VC Makeup 2+2” VC Recirculation 2” VA Non Accessible 2” FHB 2”	VC Makeup 2+2” VC Recirculation 2” VA Non Accessible 2” FHB 2”	VC 2+2” VG 2”	VC Makeup 2” VC Recirculation 2” VE Recirculation 2” VG 8”	VC 2+2” VG 2”
Total Residence Time per Bed Depth	≥ 0.25 sec	≥ 0.25 sec	≥ 0.25 sec	VC Makeup ≥ 0.25 sec VG ≥ 0.25 sec VC and VE Recirculation ≥ 0.125 sec	≥ 0.25 sec
Penetration of Methyl Iodine	VC Makeup < 0.5% VC Recirculation < 4.0% VA NonAccessible < 4.5% FHB < 10%	VC Makeup < 0.5% VC Recirculation < 4.0% VA NonAccessible < 4.5% FHB < 10%	VC < 0.5% VG < 2.5%	VC Makeup < 2.5% VC & VE Recirculation <15% VG < 0.5%	VC < 0.5% VG < 2.5%

Notes: VC - Control Room Ventilation
VG - Standby Gas Treatment Ventilation
VE - Auxiliary Electric Equipment Room Ventilation
VA- Auxiliary Building Ventilation
FHB - Fuel Handling Building
2+2”- 2 Beds Each 2 Inches Thick