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 AUTH. NAME: BLISS, H.E. AUTHOR AFFILIATION: Commonwealth Edison Co.
 RECIP. NAME: REGION 3, Ofc of the Director RECIPIENT AFFILIATION: Region 3, Ofc of the Director

SUBJECT: Responds to NRC 880621 ltr re violations noted in Insp Repts
 50-254/88-10 & 50-265/88-11.

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Commonwealth Edison

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August 15, 1988

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Quad Cities Station Units 1 and 2
"Response to IE Inspection Report
Nos. 50-254/88010 and 50-265/88011"
NRC Docket Nos. 50-254 and 50-265

Reference (a): Letter from J.J. Harrison to Cordell Reed
dated June 21, 1988.

Dear Mr. Davis:

This letter is in response to the inspection conducted by the Nuclear Regulatory Commission (NRC) Nondestructive Examination (NDE) Mobile Team of NRC's Region I Office on April 18 through April 29, 1988 of activities at Quad Cities Station Units 1 and 2.

The referenced letter indicated that no violations of NRC requirements were identified in the course of the inspection. However, the letter did require Commonwealth Edison Company to provide a written response to Unresolved Item No. 50-265/88011-04 (use of SNT-TC-1A 25% rule).

The Inspection Report did not establish a date by which a response was required. In a July 15, 1988 telephone conversation between Ms. I.M. Johnson of my staff and Mr. D. Danielson of your staff, it was mutually agreed that a response would be supplied by August 15, 1988. The Commonwealth Edison Company response to that Unresolved Item is provided in Attachment A.

If you have any questions regarding this matter, please contact this office.

Very truly yours,

H. E. Bliss
Nuclear Licensing Manager

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Attachment A

cc: NRC Resident Inspector - Quad Cities

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ATTACHMENT A

COMMONWEALTH EDISON RESPONSE TO UNRESOLVED

ITEM NO. 50-265/88011-04 - USE OF SNT-TC-1A

25% RULE

BACKGROUND

A routine safety inspection of station activities at Quad Cities Station Unit 1 and 2 was conducted by the NRC NDE Mobile Team of the NRC's Region I office on April 18 through April 29, 1988. A part of the NRC inspection activities consisted of a selective examination of procedures and representative records. The NRC inspector, during his review of the Commonwealth Edison Company's Special Process Procedure Manual (SPPM), made an observation that the requirements in Commonwealth Edison Company's SPPM are not consistent with or do not meet the intent of the SNT-TC-1A. As a result, Mr. J. J. Harrison, NRC Region III, requested a written response to the item (No. 50-265/88011/04) in a letter dated June 21, 1988 to Mr. C. Reed, Commonwealth Edison Company.

The NRC Inspector's observation pertains to the so called "25% rule" in recommended Practice No. SNT-TC-1A, June 1980 edition, published by American Society for Non-Destructive Testing (ASNT) and the requirements in the procedure 1-1-0, Rev. 24 of Commonwealth Edison's SPPM. The NRC inspector stated that the Commonwealth Edison Company procedure in the SPPM has improperly used the SNT-TC-1A 25% rule and that a possibility exists that Commonwealth Edison Company NDE personnel could fulfill certification requirements without satisfying the ASME requirements for minimum experience. The conclusion was based on the review of the certification of one Commonwealth Edison Company individual who spent most of his worktime on Quality Control (QC) related activities not involving actual application of NDE. The NRC Inspector believed this individual may have been certified using the 25% rule. The individual referenced here is actually certified as a "Radiographic Interpreter", a special category of NDE personnel identified in Commonwealth Edison Company's SPPM. Commonwealth Edison believes that application of the 25% rule and qualification requirements of "RT Interpreters" are two separate issues and will be treated as such in our response which follows:

25% Rule:

Table 6.2.1A of SNT-TC-1A contains a statement, "credit for experience may be gained simultaneously in two or more disciplines. The candidate must spend at least 25 percent of his worktime on each discipline for which experience is being claimed." This provision has been incorporated into procedure 1-1-0, paragraph 6.1.1 of Commonwealth Edison Company's SPPM in which it is required that "an individual may gain field experience in two or more NDE methods simultaneously. The individual must spend at least 25% of his worktime on each NDE method for which field experience is being claimed". This clearly shows that Commonwealth Edison Company's requirements in the SPPM are consistent with those in the SNT-TC-1A.



A review was performed, at the NRC's request, of the qualification and certification of all present and past Commonwealth Edison Company personnel where the SNT-TC-1A 25% rule was used. The results of the review of the certification records showed that, of the seventeen NDE inspectors within the Commonwealth Edison system, six work in System Materials Analysis Department (SMAD) which is a group dedicated full time to performing NDE. The remaining eleven are assigned to various generating stations. Of those eleven, eight are qualified and experienced individuals who were hired into Edison from outside NDE Companies. It is our understanding that the question of adequacy of training and experience pertains to neither the SMAD NDE group nor with respect to experienced inspectors recruited from outside testing companies. The question was raised in regard to those Commonwealth Edison Company qualified individuals who are not full time NDE personnel. Our records show only three inspectors who fall into this category. Two are certified to perform only penetrant testing (PT) and one is certified to perform PT and MT (magnetic particle testing).

If the provision in the SPPM and SNT-TC-1A for simultaneous qualification using the 25% rule was to be used, it would have been in the case of this one individual who is certified in both PT and MT. The review of his certification showed that the 25% rule was not invoked. He had logged one month work experience as defined in the SPPM for each discipline separately before he was certified as a Level I inspector. He also worked an additional two months as a Level I PT inspector before becoming a Level II PT inspector, and an additional 3 months as a Level I MT inspector before being certified as a Level II MT inspector. Even though Commonwealth Edison Company's SPPM provides for use of the 25 percent rule as stated above, a review of personnel certification records showed that this rule was never invoked for Commonwealth Edison Company qualified inspectors.

Radiographic Interpreters

A special subcategory of NDE personnel certified as "Radiographic Interpreter" is identified in the SPPM. This special "RT Interpreter" category was created to develop individuals who would have sufficient knowledge of RT method to review radiographic work done by outside testing contractors. As specified in Commonwealth Edison Company's "written practice" (SPPM), an "RT Interpreter's" duties are limited to reviewing the radiographic work performed by the others to ensure that radiographs are of good quality and that proper codes and standards have been followed and that defects have been properly identified and evaluated. These RT Interpreters are neither trained to perform actual radiography nor are they allowed to specify techniques or test parameters. We believe that with these limitations, the subcategory of RT Interpreter, is acceptable and meets the intent of the code because:

- a. It is permissible according to the SNT-TC-1A recommended practice to create subcategories of NDE personnel depending upon the employer's special needs provided the duties, responsibilities, qualification requirements, and any limitations on their certification are described in the employers written practice.



- b. Paragraph IWA-2300.a.3 of ASME Section XI, Winter 80 Addenda, states that, ".....training for NDE personnel who perform only one operation of a non-destructive examination method that contains more than one operation, or who perform non-destructive examination of limited scope, may be less than that recommended in Table 6.2.1A of SNT-TC-1A".

We believe that reading and reviewing radiographs is only one aspect of multiple tasks involved in radiographic testing. Our RT Interpreters receive extensive classroom training and they spend a minimum of three months reviewing radiographs under the supervision of an experienced and certified RT person. Finally, they take a practical film interpretation test to demonstrate their ability to Commonwealth Edison Company's Chief Level III before being certified as Level II RT Interpreter. These Interpreters played a valuable role in overseeing quality of a voluminous amount of RT work performed by the contractors during Commonwealth nuclear plant construction program.

Summary

Commonwealth Edison's program for qualification and certification of the personnel involved in NDE related activities was designed to provide various degrees of NDE expertise to fulfill our needs. In addition to SMAD's NDE group, all nuclear plants need some personnel in their QC, QA, ISI and Tech Staff groups to be familiar with some, if not all, aspects of NDE disciplines in order to control the overall quality of the NDE work done at their respective plants. Our program as defined in the SPPM provides rules for the training and certification of those "limited" NDE personnel as well as defining the rules for qualification of actual "Examiners or Testers" which are, we believe, in strict accordance with the ASME Code. The extensive review of personnel records showed that 25% rule was not applied in certification of any of the NDE examiners. The "RT Interpreters" subcategory of NDE personnel is permissive by the ASME Code and meets the intent of SNT-TC-1A recommended practice.

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