



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

August 10, 1979

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: LaSalle County Station Units 1 and 2
Response to IE Inspection Report
Nos. 50-373/79-24 and 50-374/79-17
NRC Docket Nos. 50-373 and 50-374

Reference (a): J. G. Keppler letter to B. Lee, Jr.
dated July 19, 1979

Dear Mr. Keppler:

The following is in response to the investigation conducted by Mr. C. C. Williams on May 30 and 31; and June 4, 1979 of activities at LaSalle County Units 1 and 2. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. These activities are addressed in the enclosure to this letter.

Please refer any additional questions you may have on this matter to this office.

Very truly yours,

Louis O. DelSerge

for Cordell Reed
Assistant Vice-President

enclosure

790929 571

1055 010 AUG 13 1979

ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION

The response to the item of apparent noncompliance identified in Appendix A of the NRC letter dated July 19, 1979 (IE Report Nos. 50-373/79-24 and 50-374/79-17) is provided in the following paragraphs.

1. 10 CFR Part 50, Appendix B, Criterion XVI, states in part that "measures shall be established to assure that conditions adverse to quality such as ... deficiencies ... and non-conformances are promptly identified and corrected. Further, the CECO. Topical Report CE-1A dated January, 1976 and CECO. QA Manual Quality Requirement 16 commits to the establishment of measures for identification and corrective action regarding nonconformances.

The applicable CECO. Station Nuclear Engineering Department Procedure No. Q-34 issued December 1, 1977 ("... method for processing Data Report Form N-5 ...") among other requirements, specifies in Paragraph No. 3.2.3, that the Project Engineer "reviews N-5 form with supporting documents for correctness..."

Contrary to the above, on March 14, 1979, the licensee's representatives established a Certificate of Compliance (N-5 Data Report) which indicated that a Certified Stress Analysis Report had been established by the Architect Engineer (Sargent and Lundy) for Unit 1 Feedwater System, whereas, on June 4, 1979, it was confirmed that a Certified Stress Analysis Report for the Unit 1 feedwater system had not been established. The control systems apparently were not implemented.

A. CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

It is acknowledged that Commonwealth Edison certified the subject N-5 Forms without prior review of all supporting documents (specifically, the Certified Stress Report) and that this was in apparent noncompliance with the cited Station Nuclear Engineering Department (SNED) procedure (Q-34). Although action has been taken to both correct this occurrence and prevent its recurrence, it is relevant to note the following:

1055 011

- 2 -

- (1) The certification was made in the belief that the Certified Stress Report, as distinguished from the Stress Analysis Report completed prior to certification based on as-built drawings, was not required. Therefore, the existence of the certified Stress Report was not verified prior to certification.
- (2) The N-5 Forms in question had not previously been processed at the LaSalle County site by either the authorized installer (Morrison) or the certificate of authorization holder (Commonwealth Edison). This is due in part to the fact that LaSalle County is one of the earliest plants at which ASME Section III rules are being applied for piping systems.

Although, in the judgement of Commonwealth Edison, the appropriateness of the subject noncompliance may be subject to question, corrective action to resolve the apparent violation was undertaken, as summarized in Paragraph 4 in the Region III Investigation Report.

First, an inquiry was directed to the ASME Boiler and Pressure Vessel Committee to clarify the apparent ambiguities relative to completion of the N-5 Form. A copy of the response to this inquiry is attached. (See Attachment I) On the basis of this response, it is verified that the NA Certificate Holder (Morrison) can certify the N-5 Form prior to verification of the existence of a certified Stress Report because that certification applies only to the completeness of the piping system installation, not its design.

Second, upon identification of a potential misinterpretation of the certification requirements for the N-5 Form, Commonwealth Edison halted the signing of any more of these forms for piping systems requiring a certified Stress Report. The SNED procedure (Q-34) is being revised to clarify the Commonwealth Edison responsibility with regard to the N-5 Form.

Third, a stop work order was given for any Section XI work on piping systems for which there was any question on the need for a certified Stress Report. Upon the receipt and review of documentation from General Electric, the stop work was lifted

1055 012

- 3 -

on the recirculation system but remains in effect on the feewater system. It is worth noting here that it is the judgement of Commonwealth Edison that Section XI work can proceed on systems on which the NA Stamp has been applied and that such stamping is authorized by the Code at such time as the Authorized Installer certifies the completion of the piping installation. Therefore, completion of the N-5 Form is not required. This position has been reviewed with the LaSalle County Authorized Inspector and meets with his agreement. A formal inquiry to ASME has not been made.

Fourth, a complete review of N-5 Forms submitted to SNED was conducted. In those instances for which there was any reason to believe ASME Section III requirements had not been met, the signature of Mr. W. L. Stiede has been retracted. It will not be re-affixed until the existence of all required documentation has been verified.

In addition, the installation contractor has been directed to cease entering design information on the N-5 Form. We acknowledged that the portion of the form entitled, "Stress Analysis (Design) Reports" is the responsibility of Commonwealth Edison. This responsibility will be clarified in a revision to the applicable SNED Procedure Q-34 which is currently in progress.

B. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Commonwealth Edison recognizes the importance of resolving the concern identified in the Region III investigation report and has undertaken corrective action to assure the necessary compliance with ASME Code rules.

1. In the future, Commonwealth Edison personnel will review the information in the Design Certification block on the N-5 Form to assure that it is correct. This review will be completed prior to certification of the N-5 Form by Commonwealth Edison.
2. A comprehensive review and clarification of SNED Procedure Q-34 will be made. Orientation of personnel in the application of that procedure will be conducted.

1055 013

- 4 -

3. A procedure delineating the steps required to complete the N-5 Data Reports will be prepared by the installation contractor.

C. DATE OF FULL COMPLIANCE

Corrective actions to resolve the item of noncompliance as described in Paragraph A are complete.

Corrective action to prevent future recurrence of the subject noncompliance is in progress. Instructions have been given to assure the implementation of Item 1 in Paragraph B. The revision to SNED Procedure Q-34 will be implemented by October, 1979. An N-5 Form Procedure will be implemented by the installation contractor by October, 1979.

1055 014

ATTACHMENT I



The American Society of Mechanical Engineers

United Engineering Center • 345 E. 47th St., New York, N.Y. 10017 • 212-644-7722 • TWX-710-581-5267

THE BOILER AND
PRESSURE VESSEL
COMMITTEE

July 30, 1979

Chairman
P. M. BRISTER

Vice-Chairman
W. L. HARDING

Secretary
G. M. EISENBERG

Commonwealth Edison
P. O. Box 767
Chicago, IL 60690

Att: W. L. Stiede

Subject: Section III, Division 1
N-5 Data Report Form
Certification of Design Information

Reference: Your letter of June 8, 1979
ASME File #NI 79-176

Gentlemen:

In response to your letter, it is our understanding that you are asking the following question:

QUESTION:

Is it required by ASME Code Section III that the NA Certificate Holder be responsible for certification of design information for a piping system on the N-5 Data Report Form?

REPLY.

No. The N Certificate Holder with overall responsibility for the piping system shall be responsible for the design of the piping system.

Yours truly,

Robert E. Glazier

Robert E. Glazier
Assistant Secretary
(212) 644-8048

REG:cv

1055 015