



Commonwealth Edison

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

Data Sheet  
Attached

June 1, 1979

*Naidu*

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. 50-373/79-13 and 50-374/79-10  
NRC Docket Nos. 50-373 and 50-374

Reference (a): G. Fiorelli letter to B. Lee, Jr.  
dated May 1, 1979

Dear Mr. Keppler:

The following is in response to the inspection conducted by Messrs. K. R. Naidu, G. F. Maxwell, J. Hughes and P. A. Barrett on March 22-23 and April 3-6, 1979 of activities at LaSalle County Units 1 and 2. Reference (a) indicated that certain activities appeared to be in non-compliance with NRC requirements. These activities are addressed in the enclosure to this letter.

We have carefully reviewed the circumstances relating to Items 1.a and 4 in the Notice of Violation and it is judged that our activities in these instances did not constitute noncompliance to requirements. Our review of these two items is also contained in the attachment to this letter.

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

Very truly yours,

*C. Reed*

Cordell Reed  
Assistant Vice-President

enclosure

7907240678

05 1979

363 188

ENCLOSUREResponse to Notice of Violation

Items of apparent noncompliance identified in Appendix A of the NRC letter dated May 1, 1979 are responded to in the following paragraphs.

1. 10 CFR 50, Appendix B, Criterion III states, in part, "... measures shall include provisions to assure that appropriate quality standards are specified and included in design documents ... Measures shall also be established for selection, and review for suitability of application of materials ... that are essential to the safety-related functions of the structures, systems and components."

Commonwealth Edison Company Topical Report CE-1-A, Revision 5, Section 3, states, in part, "... design evaluations or reviews are conducted to written procedures and include consideration of quality standards, quality assurance requirements, material suitability, process suitability, interface control ..."

Contrary to the above, the inspector identified that:

- A. The cables and components comprising the instrumentation for redundant post-accident tracking of the reactor pressure/level, addressed in FSAR Section 7.5.1.2, were incorrectly classified as non-safety related.

Response

The cable and components addressed in this section of the Notice of Violation, which are a part of the post-accident tracking system for reactor pressure and level, have not been incorrectly classified as non-safety related as indicated. This equipment is addressed in Section 7.5.2.2.b.1 of the LaSalle FSAR where it is stated that "All equipment except the recorders and indicators" are seismically qualified. Therefore, the classification of the recorder and associated cable and equipment as non-safety related conforms to the FSAR.

- 2 -

Furthermore, in response to Question 031.52 (FSAR Amendment 34, dated June 1978) all those indicators for which seismic qualification is required were identified. This listing does not include reactor pressure/level recorders. This information was communicated to the Region III Inspector by Commonwealth Edison at the time of the inspection but has apparently not been factored into the inspection report.

Although we acknowledge that the classification of this equipment remains the subject of continuing discussion with the NRR Staff, the installed configuration observed at the plant is in accordance with the current FSAR. Identification of this "open item" in the Safety Analysis Review as a noncompliance is, we believe, unjustified since the procedure by which such matters are reviewed and resolved with the NRC Staff is still in process.

- B. The Reactor Building HVAC Control Panels and associated conduits/cables were mounted on a wall which had not been constructed to withstand the design basis accident.

#### Corrective Action Taken and Results Achieved

The consulting engineer (Sargent & Lundy) has been instructed to revise the design of the Reactor Building HVAC control panels to correct this problem.

#### Corrective Action to Avoid Further Noncompliance

Commonwealth Edison will direct Sargent & Lundy to conduct a separate, independent review of all safety-related HVAC systems. Any similar problems noted during this review will be corrected.

#### Date when Full Compliance will be Achieved

We expect the Sargent & Lundy review to be completed by July 31, 1979.

363 190

- 3 -

- C. Neither procedures, drawings nor instructions being utilized contained requirements to assure that suitable fastening materials were used for certain Class IE motor terminal connections.

Corrective Action Taken and Results Achieved

Nonconformance Report (NCR) 312 has been written to identify where cadmium plated bolts were used as fastening material and to document the conflict between the Commonwealth Edison standards for stainless steel bolts and the Sargent & Lundy standards for cadmium plated bolts. Commonwealth Edison will resolve the conflict in the standards and provide dispositions for the installed bolts.

Corrective Action to Avoid Further Noncompliance

In addition to NCR 312, Field Change Request (FCR) 3572 is being written to identify Specification EM 51308 and C849 where fasteners larger than 3/8" in diameter are necessary. These specifications are for stainless steel bolts. H. P. Foley has been instructed to use these specifications until Commonwealth Edison provides a resolution to NCR 312. NCR 312 also provides a resolution for fasteners less than 3/8".

Date when Full Compliance will be Achieved

Resolution of the NCR should be completed by July 31, 1979.

2. 10 CFR 50, Appendix B, Criterion V requires that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with the instructions, procedures or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

CECo. Topical Report CE-1-A, Revision 5, Section 5, states in part, "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, specifications, or checklists. These documents will assist personnel in assuring that important activities have been performed. These documents will also reference applicable

363 191

- 4 -

acceptance criteria which must be satisfied to assure that the quality-related activity has been properly carried out. Activities affecting quality are required by the Commonwealth Edison quality program to be prescribed by documented instructions, procedures or drawings."

Contrary to the above, the procedures, drawings, and instructions that are being utilized do not require electrical inspection personnel to inspect the installation of electrical stress cones on safety-related medium voltage electrical cables.

#### Corrective Action Taken and Results Achieved

We believe the medium voltage termination program assures a quality stress cone. A procedure is used for each type of stress cone. Only qualified and experienced journeymen electricians are used for this work. All electricians who have made medium voltage terminations have attended termination training sessions.

The termination procedure makes the electrician responsible for his work by having him sign the termination card. The Electrical Supervisor (i.e., Foreman, General Foreman, and Superintendent) and H. P. Foley Q.A. personnel have performed spot checks in the past. Commonwealth Edison's past experience and testing have shown this type of progress to be adequate. We do not agree that the procedures, drawings, and instructions did not require electrical personnel to inspect the installation of stress cones on medium voltage electrical cables.

The H. P. Foley termination procedure has been revised to require periodic surveillance by Q.A. personnel for activities such as stress cone installation. Q.A. personnel should have documented their inspections in the past. To correct this, a stress cone made by each 2 man termination crew will be inspected and documented.

#### Corrective Action to Avoid Further Noncompliance

H. P. Foley will perform and document in-process inspections on the Unit 2 medium voltage stress cones.

#### Date when Full Compliance will be Achieved

Sample inspections on the medium voltage terminations for Unit 1 will be completed by July 1, 1979.

363 192



3. 10 CFR 50, Appendix B, Criterion X, requires that a program for inspection of activities affecting quality be established and executed by or for the organization performing the activity to verify conformance with documented instructions, procedures and drawings for accomplishing the activity.

CECo. Topical Report CE-1-A, Revision 5, Section 10, states, in part, "Inspection Programs will be established to provide assurance that the quality control surveillance, inspections, and tests defined in the applicable equipment specifications are performed. The Commonwealth Edison Site Supervisor of Quality Assurance or Quality Assurance Coordinator will assure that surveillance of contractor's activities is performed with inspection checklists."

Contrary to the above, an inspection plan outlining the attributes to be inspected in a timely manner by the civil and mechanical contractors, including drawings to be used with relevant acceptance/rejection criteria, had neither been developed nor implemented for the installation of seismic Category I NSSS instrument panels.

#### Corrective Action Taken and Results Achieved

Part of the problem in inspecting the projecting lengths of embedded anchor bolts and clearances between the panel frame and the floor is that no tolerances had been specified by Sargent & Lundy. Sargent & Lundy has written a letter specifying these tolerances. Morrison Construction Co. will verify that the panel and the anchor bolts are within these tolerances along with the anchor bolt torquing and panel levelness.

#### Corrective Action to be Taken to Avoid Further Noncompliance

As mentioned above, Morrison Construction Co. will verify that the anchor bolts and panel are set within the tolerances specified by Sargent & Lundy. After the panel has been set and inspected, it will be released for grouting. Walsh Construction will grout the panel in accordance with the drawings and specification. Sargent & Lundy has also written a letter clarifying the grouting of safety-related equipment. A final walkdown of the instrument panels will be done prior to turnover of the system to catch items like missing instruments, mounting screws, broken instruments, etc. The NSSS supplier will be contacted as necessary for mounting ship short or removed instruments on the panels.

363 193

Date When Full Compliance will be Achieved

July 1, 1979

4. 10 CFR 50, Appendix B Criterion XVIII, requires a comprehensive system of planned and periodic audits to be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program. The audits are to be performed in accordance with written checklists by appropriately trained personnel not having direct responsibilities in the areas being audited.

CECo. Topical Report CE-1-4, Revision 5, Section 18, states, in part, "Audits will be performed by Commonwealth Edison Company and/or its contractors ... to verify the implementation and effectiveness of quality programs under their cognizance. Audits under the responsibility of the Manager of Quality Assurance will cover quality systems for engineering construction, modifications, maintenance... activities."

Contrary to the above, a comprehensive system of audits was neither planned nor executed to verify the proper installation and inspection of NSSS instrument panels.

Response

A complete reading of Section 18 of the referenced Topical report shows the following: "Audits will be performed to evaluate the implementation of the quality assurance programs and the adherence to procedures and controls. Certifications and records will also be evaluated. Product audits assess the effectiveness of inspections, installation, construction, testing and operation of an item." Furthermore, the Topical Report states that, "Audits will be performed selectively at various stages of the contract on a varying frequency based on the nature and safety significance of the work being done to verify compliance and determine the effectiveness of procedures inspections, test, process controls, and documentation."

Site Quality Assurance has complied with CECO. Topical Report CE-1-4, Revision 5, Section 18. Section 7 of the Morrison Construction Company Q.A. Manual was audited during the last quarter of 1978 (Audit Report 1-78-47). This section entitled, "Process of Control, Field Fabrication and Erection encompasses

- 7 -

the scope of Morrison procedure PC-10, which covers the installation of mechanical equipment. MOCO has always contended that this procedure covers the installation of instrument panels which they install. This instrument panel installation was not specifically covered in that audit, just as other similar installation practices for other types of mechanical equipment were excluded. Audits are not performed on each and every field activity but are selectively performed as per Topical Report CE-1-4, Revision 5. 41

The 1979 audit schedule for Morrison approved by the Director of Quality Assurance on November 29, 1978 requires MOCO procedure PC-10 to be specifically audited during May, 1979. The referenced instrument panels which are presently in various stages of completion will be an audit topic during this audit.

Compliance with Quality Assurance Requirements is assured by means of on-going audits of the various contractors' quality programs and of Station Construction activities. As stated by the referenced Topical Report, "The elements in the quality program, in procurement documents and in related codes and standards, are subject to system audits. Also, items received, fabricated, constructed, or installed for use by CECO in its nuclear plants is subject to audit." The Topical Report also states that "Audits will be conducted efficiently in order to achieve a minimum of interference with work in progress and disruption of organizations being audited." The audit schedule is designed to meet this goal.

Furthermore, in order to assure properly implemented quality control over various in-process phases of the project, and on-going program of surveillances of the work in-process has been and is being conducted by the Quality Assurance Department. This program is designed to identify any potential problem areas. If problems identified in these on-going surveillances are not immediately corrected, the problem is included in a near term audit as an approved audit checklist item.

Accordingly, we feel we were in compliance with the requirement identified in the Notice of Violation at the time of the inspection and activities as described above will be continued.

363 195