



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
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July 20, 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
Supplemental Response to IE Inspection
Report Nos. 50-373/79-13 and 50-274/79-10
NRC Docket Nos. 50-373 and 50-374

References (a): J. G. Keppler letter to B. Lee, Jr.
dated June 29, 1979

(b): C. Reed letter to J. G. Keppler
dated June 1, 1979

Dear Mr. Keppler:

The following is in response to your request for additional information (Reference (a)) regarding the subject inspection reports. This response shall address that request as clarified by Messrs. E. Schweinbinz and P. A. Barrett on July 17, 1979 and July 18, 1979 respectively. With the exception of Item 1.a., for which our recommended approach to resolution is identified in the attachment, it is our judgement that the attached information satisfies the request for information in Reference (a). In the case of Item 1.a, you will note that we shall await the response of Mr. Barrett and representatives of the NRR Staff. It is our belief, in which Mr. Barrett expressed concurrence, that this item cannot be resolved without a comprehensive discussion involving both your Staff, NRR Staff and Commonwealth Edison.

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

Very truly yours,

C. Reed

Cordell Reed
Assistant Vice-President

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ATTACHMENT

Supplemental Response
to
Notice of Violation

The following supplemental information is provided in response to the items of apparent noncompliance identified in Appendix A of the NRC letter dated May 1, 1979, as clarified and augmented by the NRC letter dated June 29, 1979. This supplemental response shall follow the format of the original response to the noncompliance transmitted in Reference (b).

- 1.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

Commonwealth Edison has classified the ancillary components (cable and transmitter) which were the subject of this apparent noncompliance as non-safety related. This classification is justified by the fact that the components with which the subject cable and transmitter are associated are non-seismic and non-safety related. This position is found in the text of Section 7.5.2.2.b.1 of the LaSalle County FSAR and is supported by the response to Question 031.52 (FSAR Amendment 34 dated June, 1978).

It is recognized that a question of interpretation exists relative to the classification of these components, which can only be resolved by a meeting of the parties involved (NRC - Region III, NRC - NRR Staff, Commonwealth Edison). Mr. P. A. Barrett of Region III agreed that such a meeting was necessary and further agreed that the final determination of the validity of this apparent noncompliance should be deferred until such a meeting takes place. Mr. Barrett agreed to coordinate the scheduling of that meeting. Commonwealth Edison will await a response from Mr. Barrett.

- 1.B. Regarding Item I.B, the response for corrective action to avoid further noncompliance provided in Reference (b) identified a review of all safety-related HVAC systems. Region III assumes this action will encompass the

identification and control of similar situations for all safety-related components regardless of system.

Response

Commonwealth Edison acknowledges that a review of all safety related control panels and associated conduits/cables will be made to assure that such equipment is not mounted on a wall which has not been constructed to withstand the design basis accident.

- 1.C. Region III requests clarification of the planned efforts to inspect and verify the adequacy of the installation of fasteners for certain Class IE motor terminal connections.

Response

As was indicated in Reference (b), resolution of the question of suitability of the fastener materials addressed in this apparent item of noncompliance was to be accomplished by the evaluation of NCR 312. That Nonconformance Report has now been resolved by the Commonwealth Edison Station Nuclear Engineering Department (SNED). The conclusions identified in the SNED resolution are as follows:

- (1) Existing terminations previously made with cadmium bolts are acceptable;
- (2) Stainless steel bolts will be used on all new terminations after September 1, 1979 or earlier, if bolt (stainless steel) deliveries can be advanced.

The H. P. Foley termination surveillance checklist is being revised to document the type of bolting material used. This checklist revision will be completed by July 27, 1979 and used for new terminations. The terminators will be instructed to note on the termination card the type of bolt used.

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Prior to the use of stainless steel bolts, it has been confirmed that H. P. Foley had purchased cadmium plated bolts exclusively. Because cadmium plated bolts were the only type of bolts available at the electrical warehouse, resolution of NCR 312 which accepted the prior use of such cadmium bolts provides the necessary assurance of the acceptability of the existing completed terminations in question.

2. Region III requests clarification of the planned efforts to inspect and verify the adequacy of the installation of electrical stress cones on safety-related medium voltage electrical cables.

Response

As was indicated in Reference (b), a program was implemented to verify the adequacy of existing stress cone installation. The program, which is now complete, covered 14% of the medium voltage stress cones that have been made on Unit 1. One medium voltage stress cone installed by each of the 2 man termination crews has been inspected. The stress cones inspected were made between September, 1977 and February, 1979. All of the inspected stress cones were found to be acceptable. Based on these results, we believe the adequacy of the medium voltage stress cones previously installed in Unit 1 has been verified.

4. Region III reaffirms its contention that a comprehensive system of audits was neither planned nor executed to verify the proper installation and inspection of NSS instrument panels. The contention, as clarified in Reference (a), is based on the concern that the audit program which relies on surveillances and audits may not focus sufficiently on interface activities where more than one contractor is involved in the installation of equipment.

Response

Although our response to the item of noncompliance addressing the auditing of contractor activities remains basically unchanged, we acknowledge the fact that our audits

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and surveillances have in the past been oriented toward contractor specific functions. This approach has, we feel, provided verification of contractor Q.A. program effectiveness and its implementation.

However, based on the clarification provided in Reference (a), the concern intended to be conveyed by the original report is now understood. Accordingly, we have taken steps to expand the audits and surveillances to focus on interface activities where more than one contractor is involved. Initial action was to audit the particular interface activities of Morrison as they related to panel and equipment installation. This completed audit, though specific, has provided us with information which will be used to formulate and conduct surveillance and audits of other contractors such as the HVAC contractor. Discussions have been initiated at the site to assure proper coordination of contractor interface activities. Expanded surveillance coverage will be implemented to evaluate these activities and problems identified by surveillance will be included in near-term audits if not immediately corrected. If deficient conditions are identified, corrective action will be taken. The completed action for previously installed equipment. will be performed to CECO's satisfaction.

Further, the matter of contract interfaces is also being given attention at our other two construction sites. Also, the General Office Audit of Construction sites during the second half of 1979 will include contractor interface activities.