




EXPANSION JOINT DIVISION

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DATE: 4/12/93 YOUR P.O.: _____
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 (INCLUDING COVER SHEET) OUR P.O.: _____
 COMPANY NAME: USNRC Operations Center OUR JOB: _____
 ATTENTION: GAIL MARCUS - Generic Comm. Br. OUR QUOTE: _____
 SENDER: DICK JORDAN  Director of Nuclear Contracts
 and Quality Assurance

MESSAGE

Copy of advance notification letter sent to
 Commonwealth Edison re: Possible 10CFR21
 Reportable Non-Compliance at Quad Cities
 Nuclear Station Unit #1, Cordova, IL.

10 CFR 21

**EXPANSION JOINT DIVISION**

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April 12, 1993

Commonwealth Edison Company
Quad Cities Nuclear Power Station
22710 206th Avenue North
Cordova, IL 61242

Attention: Charles A. Moerke, Site Engineering Supervisor

Subject: 10CFR21 Reportable Non-Compliance

RE: Commonwealth Edison Co. P.O. No. 343180 and 325463
Senior Flexonics Jobs N144 and T104N

This is to advise you that the clam shell expansion joints supplied to you on the above referenced purchase orders were not hydrostatic tested as required by ASME Section III, Class MC, 1980 Edition with Summer 1982 Addenda, Para. NE-6230, prior to the applicable data reports being certified.

In the case of P.O. 343180(N144), these items were NPT stamped and an N-2 Data Report completed and certified by Senior Flexonics and our Commercial Union Authorized Nuclear Inspector. Based on the requirements of NCA-8320, the NPT stamp should not have been applied and the data report should not have been certified without performance of the required hydrotest.

In the case of P.O. 325463(T104N), the same scenario applies except that these units were not NPT stamped or N-2 Data Report certified. However, in this instance, a "Certificate Holder's Data Report of Third Party Inspection for Non-Stamped Identical Nuclear Parts" was completed and certified by the same parties as above. This data report basically certified to the same criteria as a standard N-2 report does.

Based on the above information, it is the opinion of Senior Flexonics that both of these situations would be reportable under the rules of 10CFR21.

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By this letter, we request your concurrence and assistance in this matter. If you do not concur please advise us, in writing, of your reasons for non-concurrence and the justification for your reasoning.

If you do concur, please advise us of the safety hazard that could be created should these items not function as certified. This information needs to be included in our formal report to the NRC.

Senior Flexonics honestly feels that these items will function totally as they were designed to and does not feel that there is any impending safety concern.

The cause of this situation appears to have been strictly an oversight by all parties concerned.

Senior Flexonics believed, or wrongly assumed, that these units would be subjected to a system test after installation and obviously were not reading the code requirements thoroughly, otherwise, we would have realized that the stamping and certifying could not have been completed until the hydrotest was complete. Senior Flexonics included a statement on the Commonwealth Edison Co. approved drawings that the pressure test would be by "Others" and also included a statement "Hydrostatic test will be performed by others after installation" on the N-2 form.

Obviously, there was no intent on the part of Senior Flexonics to circumvent Code requirements. This is a prime example of a misunderstanding of the requirement which was overlooked by all parties throughout the fabrication, certification, and installation functions.

It is now imperative that resolution of this mistake be expeditiously processed.

Senior Flexonics proposes the following actions as a possible resolution to the situation.

Senior Flexonics will fabricate two (2) bellows elements, identical to those supplied on P.O. 343180, and subject them to the Code required hydrostatic test pressure for verification that the design is more than sufficient to withstand any pressure experienced in operation and show no evidence of leakage, meridional yielding or squirm.

These test units would be fabricated from the same heat of material as those installed and processed in exactly the same manner and sequence.

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Upon successful completion of the testing of these units, Senior Flexonics proposes that these test results be utilized as justification for acceptance of the installed units in Penetration X-12 at Quad Cities-Unit No. 1. These are the inner bellows of that penetration.

All of the above operations and processes would be performed under the witness and verification of our Authorized Nuclear Inspector and would be available for witness by Commonwealth Edison Co. personnel and other interested parties.

In the case of Commonwealth Edison Co. P.O. No. 325463, please advise which of the supplied units have been installed so we may determine what action needs to be taken in regard to the installed units.

I have reviewed our inventory and verified that we still have material of the same heat in stock as was used to fabricate the bellows elements on 325463, so the same justification scenario could be followed.

Your assistance in these matters will be appreciated and I apologize for the inconvenience created by these situations.

You are requested to tag any non-installed units, on either of the above P.O.'s, identifying them as "Not for Installation" until these situations are resolved.

Your expeditious response is needed and will be greatly appreciated.

Very truly yours,

 4/12/93

Dick Jordan
Director of Nuclear Contracts
and Quality Assurance

cc: G. Hourselet -Vice President and General Manager
G. Perkins -Director of Engineering
L. Verner -Project Engineer
C. Wendler -ANI-Commercial Union
B. Juarez -ANIS-Commercial Union
Commonwealth Edison Co. Corres File
Don Noe -Commonwealth Edison Co.
George Bathje -Commonwealth Edison Co.
10CFR21 Report File
Region III-USNRC -Hubert Miller
USNRC-Operations Center-Washington, D.C.