



**Commonwealth Edison**

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May 7, 1982



Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2  
Final Report on Allegations Regarding  
Rebar Damage and Off Gas Roof Building  
Thickness  
NRC Docket Nos. 50-373 and 50-374

- References (a): Petition by The People of the State of Illinois by Tyrone C. Fahner pursuant to 10 CFR 2.206, dated March 24, 1982.
- (b): Transcript, United States of America Nuclear Regulatory Commission, Docket Nos. 50-373 and 50-374, Room P-422, 7920 Norfolk Avenue, Bethesda, MD, Wednesday, March 31, 1982.
- (c): Philip P. Steptoe letter to H. R. Denton dated April 12, 1982, regarding Mr. Bridenbaugh's testimony before the Illinois Commerce Commission.
- (d): Tyrone C. Fahner (Judith S. Goodie) letter dated April 14, 1982, to H. R. Denton, regarding Mr. Bridenbaugh's testimony before the Illinois Commerce Commission.
- (e): Tyrone C. Fahner (Judith S. Goodie) filing dated April 13, 1982, "Comments of the People of Illinois on Commonwealth Edison Company's Presentation of March 31, 1982."
- (f): C. W. Schroeder letter to A. Schwencer dated April 22, 1982, "Comments and Clarifications on Meeting Transcript, March 31, 1982."
- (g): D. G. Eisenhut letter to Cordell Reed dated April 7, 1981, "Issuance of Facility Operating License."
- (h): H. R. Denton letter to Tyrone Fahner dated April 17, 1982.

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(i): C. E. Norelius letter to Cordell Reed  
dated April 27, 1982, transmitting I&E  
Inspection Report 50-373/82-21.

Dear Mr. Denton:

The purpose of this letter is to summarize the events of the past six weeks and to provide you with a report regarding the allegations made in Reference (a).

Commonwealth Edison Company first learned of the allegations from the news media on the afternoon of Thursday, March 25, 1982, and then received a copy of the allegations (Reference (a)) from our lawyers.

On Monday, March 29, 1982, Commonwealth Edison was contacted by your office and a meeting was scheduled for 1:00 p.m., Wednesday, March 31, 1982. That meeting was recorded and a transcript was produced (Reference (b)).

On Thursday, April 8, 1982, Mr. Bridenbaugh (who provided an affidavit for Reference (a)) testified before the Illinois Commerce Commission. As was noted by letter from the attorneys for Commonwealth Edison Company (Reference (c)), Mr. Bridenbaugh "admitted that his affidavit did not justify deferring startup testing for LaSalle." On April 14, the Attorney General of Illinois responded with Reference (d), attempting to clarify what Mr. Bridenbaugh had clearly stated in testimony before the Illinois Commerce Commission.

On Tuesday, April 13, 1982, the Attorney General filed Reference (e), which provided comments on the March 31, 1982, transcript (Reference (b)). Commonwealth Edison Company submitted clarifications and corrections to the March 31, 1982, transcript by letter dated April 22, 1982 (Reference (f)).

On Saturday, April 17, 1982, the NRC granted Commonwealth Edison Company License NPF-11 (Reference (g)). On the same date, the NRC sent Reference (h) to the Illinois Attorney General describing the extensive investigation that the NRC has performed and providing justification for issuance of NPF-11, conditioned to require prior NRC staff approval for any power operation following initial criticality and zero power physics testing.

On April 27, 1982, NRC Inspection and Enforcement Region III transmitted their Inspection Report 50-373/82-21 (Reference (i)) to Commonwealth Edison Company. That report documented their review of the contention regarding damage to reinforcing steel during drilling/coring activities and stated that:

"Based on the results of our review, we have concluded that (1) adequate procedures to control concrete drilling/coring are and have been in place at LaSalle; (2) these procedures are being successfully implemented; (3) the engineering disposition of damaged reinforcing steel by S&L was proper and complete; and (4) the completed drilling/coring represents no compromise to the structural integrity of the LaSalle plant structures. This issue is considered closed."

Commonwealth Edison Company and its Architect/Engineer, Sargent & Lundy, have completed our review of the subject allegations. Enclosed please find the "Final Report in Response to Petition Made by the Office of the Attorney General, State of Illinois, In the Matter of Reinforcing Steel Damaged During the Installation of Cored and Drilled Holes and the Matter of the Off Gas Building Roof for LaSalle County Station, Units 1 and 2."

With respect to the contentions regarding rebar damage, as was discussed during the meeting in Bethesda, on March 31, 1982, engineering judgment had always been used in determining that design margins were not reduced below 1.0. The enclosed report (page 33) explains that:

"Subsequent to this meeting, detailed structural calculations were performed on all structural elements in all Unit 1 areas and in those Unit 2 areas required for Unit 1 operation where damaged reinforcing bars were identified during coring or drilling operation. . . . This evaluation verified that in no area have the design margins been reduced to a value less than 1.0, further substantiating that the engineering judgment used originally throughout the project was appropriate."

With respect to the contentions regarding the Off Gas Building Roof, the enclosed report (page 37) reiterates that:

"Commonwealth Edison Company presented data at the conference held in Bethesda, Maryland, on March 31, 1982, substantiating that the roof was, in fact, poured to a nominal 12" thickness, and that the cracking which was observed was surficial in nature, and not due to reinforcing steel damage due to the installation of concrete expansion anchors."

In conclusion, Commonwealth Edison Company regrets that direct contact was not made with us by the Attorney General when these allegations were formulated because we feel they could have been easily dispositioned without formal proceedings. Given that this situation did occur in the time frame of Unit 1 license issuance, we must commend the NRC for their prompt attention in all aspects of this matter during the past six weeks.

H. R. Denton

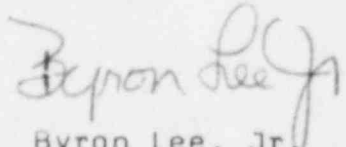
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Enclosed for your use are one (1) signed original and thirty-nine (39) copies of this letter and enclosure.

If there are any further questions in this matter, please contact C. W. Schroeder, Nuclear Licensing Administrator for LaSalle County Station.

Very truly yours,



Byron Lee, Jr.  
Executive Vice-President

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Enclosure

cc: Tyrone C. Fahner, Esq.  
James G. Keppler - Region III  
NRC Resident Inspector - LaSalle  
Philip P. Steptoe - IL&B

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