



Commonwealth Edison

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Address Reply to: Post Office Box 767
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February 22, 1983

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

Subject: Braidwood Station Units 1 and 2
I&E Inspection Report Nos.
50-456/82-07 and 50-457/82-07

Reference (a): January 19, 1983 letter from R. C. Knop
to L. O. DelGeorge.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection conducted by Mr. J. A. Hinds on December 15-17, 1982 of activities at Braidwood Station. During this inspection certain activities were found to be not in compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation appended to reference (a).

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address further questions regarding this matter to this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

TRT/lm

Attachment

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ATTACHMENT A

Response to Notice of Violation

Violation:

10 CFR 50, Appendix B, Criterion XIII, Handling, Storage and Shipping states in part that, "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

The Braidwood FSAR, Chapter 17.0, Quality Assurance, states in part: "Therefore, the Commonwealth Edison Topical Report CE-1-A, Revision 7 and all subsequent revisions unless otherwise noted in this chapter, is the basis for the Q.A. program at Byron/Braidwood Station."

The Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 22, dated November 1, 1982, Section 13, "Handling, Storage and Shipping", states "Written instructions for handling, preservation, storage and shipping will be used to specify protective conditions necessary to prevent damage or deterioration of materials and equipment."

The Byron/Braidwood FSAR; Appendix A - Application of NRC Regulatory Guides, Regulatory Guide 1.38, Revision 2, Section A1.38-1, Amendment 37, March 1982, states in part, "The applicant complies with this regulatory guide. Packaging shipping, receiving, storage and handling of PWR power plant equipment are covered by quality specifications based on ANSI N45.2.2-1972.

Example a

ANSI N45.2.2-1972, Section 6.1.2, Levels of Storage, Sub-Section (1) states in part, "Level A items shall be stored under special conditions similar to those described for Level B items, but with additional requirements such as temperature and humidity control within specified limits...."

Contrary to the above, the licensee does not have an adequate program to ensure proper monitoring and control of temperature and humidity of storage facilities evidenced by the lack of temperature and humidity monitoring and control systems in the CECO site storage Warehouse Number 3 assigned to Phillips-Getschow qualified to house Level A and below safety related mechanical equipment as of December 3, 1982.

Response a

Corrective Action Taken and Results Achieved

Thermometers that register minimum and maximum temperatures have been ordered and will be installed in Warehouse Number 3 to verify proper storage temperatures. No Level A items are stored in Warehouse Number 3. Therefore, according to ANSI N45.2.2, Section 2.7.1, no humidity control is needed.

Corrective Action Taken to Prevent Further Non-Compliance

The warehouseman has been instructed to read the thermometers on a periodic basis and record the temperature. All other site warehouses are being reviewed for the installation of temperature monitoring devices.

Date When Full Compliance Will Be Achieved

February 25, 1983.

Example b

ANSI N45.2.2-1972, Section 6.2.2, Cleanliness and Housekeeping Practices, states in part, "The storage areas shall be cleaned as required to avoid the accumulation of trash, discarded packing materials and other detrimental soil."

Contrary to the above, the licensee has not established adequate controls to maintain the required storage area cleanliness levels as evidenced by the accumulation of assorted debris observed amidst warehouse storage racks in the CECO site storage Warehouse Number 3 assigned to Phillips-Getschow to house safety related mechanical equipment.

Response b

Corrective Action Taken and Results Achieved

The debris in Warehouse Number 3 has been removed.

Corrective Action Taken to Prevent Further Noncompliance

The importance of a clean warehouse was re-emphasized to the Phillips-Getschow warehousemen and cleaning crews have been scheduled to maintain cleanliness. Scheduled surveillances are being performed by Phillips-Getschow.

Date When Full Compliance Will Be Achieved

February 15, 1983.

Example c

ANSI N45.2.2-1972, Section 6.2.5, "Measures to Prevent Entrance of Animals, states that "Measures shall be taken to prevent the entrance of rodents and other animals into indoor storage areas or equipment to minimize possible contamination and mechanical damage to stored material."

Contrary to the above, the licensee has failed to implement and maintain a program to prevent the entrance of animals into the indoor CECO site storage Warehouse Number 3 assigned to Phillips-Gettschow for the storage of safety related equipment as evidenced by signs of animal entrance and holes in the warehouse walls.

Response c

Corrective Action Taken and Results Achieved

The ripped holes in the walls were repaired and foundation filler pieces are being installed to prevent entrance of rodents.

Corrective Action Taken to Prevent Further Noncompliance

The warehousemen were instructed to report any holes or other type openings so that they could be repaired in a timely manner.

Date When Full Compliance Will Be Achieved

February 21, 1983.

Example d

ANSI N45.2.2-1972, Section 6.2, Storage Areas, states in part, "Periodic inspections shall be performed to assure that storage areas are being maintained in accordance with these requirements.

Section 6.3.1, Ready Access to Stored Items, states that "All items shall be stored in such a manner as to permit ready access for inspection or maintenance without excessive handling, to minimize risk of damage."

Contrary to the above, the licensee has failed to implement a plan or procedure to assure access to stored items for required inspections as evidenced by the methods of stacking and storing of safety related mechanical equipment observed in the CECO site storage Warehouse Number 3 assigned to Phillips-Gettschow.

Response d

Corrective Action Taken and Results Achieved

Stored items are being moved and rearranged so that they are accessible for periodic inspections.

Corrective Action Taken to Prevent Further Non-Compliance

Warehousemen were instructed to maintain access to all items at all times.

Date When Full Compliance Will Be Achieved

February 28, 1983.

Example e

ANSI N45.2.2-1972, Section 6.3.4, Identification, states that, "All items and their containers shall be plainly marked so that they are easily identified without excessive handling or unnecessary opening of crates and boxes."

Contrary to the above, the licensee has not demonstrated an effective system of controls to prevent improper storage of unidentified components as evidenced by the presence of unmarked valves and reach rods located in the northeast corner of CECco site storage Warehouse Number 3 assigned to Phillips-Getschow.

Response e

Corrective Action Taken and Results Achieved

The valves, reach rods, and small diameter wire on the wooden pallet were moved to Warehouse Number 3 from a different storage location. The valves are being identified and will be properly stored. The reach rods are a type of valve handle and do not require identification to a specific valve because they can be used on any valve of the type for which they are designed. The small diameter wires are used as probes. They have been identified by the electrical contractor and properly stored.

Corrective Action Taken to Prevent Further Non-Compliance

Warehousemen were instructed to properly store and identify material as soon as it is brought into the warehouse.

Date When Full Compliance Will Be Achieved

March 1, 1983.

Example f

ANSI N45.2.2-1972, Section 6.4.2, Care of Items, Subsection (1) states in part, "Items in storage shall have all covers, caps, plugs or other closures intact...."

Contrary to the above, the licensee has failed to establish a plan or program to assure covers, caps, and plugs or other closures remain intact for items in storage as evidenced by the absence of numerous covers, caps and plugs or other closures observed missing from safety related mechanical equipment stored in CECo site storage Warehouse Number 3 assigned to Phillips-Gettschow.

Response f

Corrective Action Taken and Results Achieved

Covers have been placed on the valves and other components. Valve OLC AS014 has been properly stored. Gauges broken during handling of valves are not replaced until the valves are installed, thereby precluding any further replacement in the event they are damaged again during handling.

Corrective Action Taken to Prevent Further Non-Compliance

Warehousemen were instructed to keep all valves capped. Phillips-Gettschow's surveillance of the warehouse will also help to control this situation.

Date When Full Compliance Will Be Achieved

February 22, 1983.

Example g

ANSI N45.2.2-1972, Section 6.2.1, Access to Storage Areas, states that "Access to storage areas shall be controlled and limited only to personnel designated by the responsible organization."

Section 6.6, Storage Records, states, in part, "Written records shall be prepared that include such pertinent information as....personnel access."

Contrary to the above, the licensee has failed to establish a program which provides the required written records (logs) of a personnel access to storage facilities as evidenced by the lack of a written records (log) or the requirements to log personnel access to the CECo site storage Warehouse Number 3 assigned to Phillips-Gettschow for the storage of safety related mechanical equipment.

Response g

Corrective Action Taken and Results Achieved

The inspection party that entered the warehouse were the NRC inspector and Commonwealth Edison employees who are known by the warehouseman; therefore, they were not challenged. No people are allowed to enter the warehouse, except those that are assigned to work there. Personnel who come to request items must have a stores request and are not allowed past the barrier are the front door. If it is necessary that anyone enter the warehouse, they are escorted by the warehouseman. Also, only authorized personnel are allowed to enter the warehouse. Phillips-Getschow will issue an instruction designating the authorized personnel.

Corrective Action Taken to Prevent Further Non-Compliance

The access control to all warehouses is being reviewed to ensure that only authorized personnel are allowed to enter our warehouses.

Date When Full Compliance Will Be Achieved

March 21, 1983.