



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

March 31, 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 Unit 1
Supplemental Response to
Inspection Report No.
50-456/82-06
NRC Docket Nos. 50-456

- Reference (a): C. E. Norelius letter to Cordell Reed
dated December 10, 1982.
- (b): L. O. DelGeorge letter to J. G. Keppler
dated January 14, 1983.
- (c): R. L. Spessard letter to Cordell Reed
dated March 8, 1983.

Dear Mr. Keppler:

This letter is a supplemental response to the inspection conducted by Messrs. R. Mendez and K. Naidu on October 21, 22, 26 and 27, 1982, of activities at Braidwood Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation was provided in Reference (b). Reference (c), which was received on March 11, 1983, requested supplemental information regarding items 1.a.3, 2, 3.a, 3.d, and 4.a, within 20 days of the receipt of that letter. The Commonwealth Edison supplemental information is provided in the enclosure.

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 upon my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

APR 1 1983

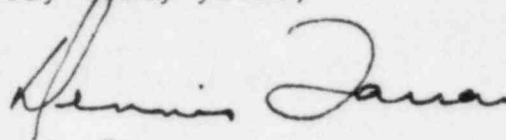
J. G. Keppler

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If you have any further questions on this matter, please direct them to this office.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Dennis J. Farrar".

D. L. Farrar
Director of Nuclear Licensing

CWS/lm

Handwritten initials "CWS" in cursive.

Enclosure

cc: NRC Resident Inspector - Brwd.

6297N

SUPPLEMENTAL RESPONSE
INSPECTION REPORT 50-456/82-06

Item 1.a.3

Item 1.a.3 concerned the separation of Class 1E cable 1SX001 from a non-safety tray. The tray documented in the item of noncompliance was in error and should be 1713C PlB and not 1689A PIE. Consequently, your response to this violation could not properly address the concern. Your response should address how Class 1E cable 1SX001 which makes contact with non-safety tray 1713C PlB does not violate the requirements of IEEE 384.

Response

Section 8.3.1.3.2.1 of the FSAR commits to compliance with IEEE Std. 384-1974 which describes separation requirements for safety-related and non-safety-related cable trays and conduits, as well as the separation requirements between safety-related and non-safety-related cables within a piece of equipment. Specific separation distance requirements between Class 1E and non-Class 1E cables when one is in a cable raceway and the other is in open air are not defined in IEEE Std. 384-1974 nor in any NRC Regulatory Document.

However, in keeping with the good engineering and installation practice of maintaining adequate separation between Class 1E and non-Class 1E cables, the electrical contractor's procedures have been revised to require the electrical contractor to maintain adequate separation between cables in air and cables in cable raceway.

In order to verify that installed cables are in compliance with the revised electrical contractor's procedures, a field walkdown of the cable tray system will be performed to determine if any of the pulled cables are installed with separation less than that specified in the contractor's procedures. The results of this walkdown will be documented and any unacceptable installation will be corrected.

The particular installation observed by the NRC Inspector involved a case where a Class 1E cable in air was in physical contact with a non-Class 1E cable tray. As described above, this particular installation does not violate any FSAR commitments since IEEE Std. 384-1074 does not address separation of cables in air to cables in cable tray, and therefore should not be reported as an Item of Non-Compliance. If this installation is not acceptable per the requirements of the contractor's procedures, then it would be identified during the field walkdown and the proper corrective action would be initiated.

Item 2

The response to Violation 2 does not appear to properly address the concern in the item of noncompliance. At issue is the correct interpretation of the tolerance delineated in S&L drawing 6E-0-3000A which states, "A cable entering a pan within 3 feet of a routing point marker...may not have that routing point listed in its routing even though the cable does not cross the point..." The intent of the above quote is understood to allow for variances in placing routing markers on cable trays. However, in this instance cable 1SX001 is routed from node point 1502F directly into the entire length of node 1573F which is not indicated on the cable routing card. Application of your three foot tolerance regarding routing markers in the manner outlined above would result in not documenting actual routing of the cables. The present interpretation of the routing tolerance does not appear adequate.

Response

As stated above, the issue is the correct interpretation of the tolerance delineated in S & L drawing 6E-0-3000A. Commonwealth Edison Company continues to feel that our interpretation is accurate. The intended purpose is to assure the correct routing of cables to S & L design. In the cited case, cable (1SX001) leaves the conduit (within 3 feet) and enters the tray at node marker 1573F. This node marker (1573F) may not have that routing even though the cable does cross the point. As previously stated, the cable routing complies to the note as described in the S & L drawing. The as installed condition complies with S & L design parameters. Therefore, the interpretation of the drawing is adequate and routing of the cable meets the intended design parameters.

For instances where the routing of cables cannot physically be met, a node marker is missing in the middle of a pan run or note C.5 of S & L drawing 6E-0-3000A is not applicable, CECO Field Change Requests are issued to document the as installed condition.

Items 3.a and 3.d

The response to violation 3.a and 3.d does not appear to properly address the concern outlined in the item of noncompliance. The response to action taken to assure that Class 1E cables are separated from non-class 1E cables in accordance with your procedure and FSAR commitments is not satisfactory. In each of the two cases, cables exit one raceway and enter a second raceway and come in close proximity (less than specified requirements) to their redundant or non-safety cables. The commitment in your procedure was understood to encompass all these situations. In your response, please provide an engineering justification that addresses the separation between Class 1E and Non-Class 1E cables when less than twelve inches as is exhibited by the two cases described above.

Response

Commonwealth Edison Company's response (Reference b) to item 3.d. does address the concern outlined in the non-compliance. As previously stated in Reference (b), in order to avoid misunderstandings, we have revised L. K. Comstock's procedure 4.3.9 to clarify the separation requirements between cables in raceway and cables in open air. (Node points 11721M and 11837S).

Reference (c) (above) also requested that we provide an engineering justification that addresses the separation. As we discussed with you at the meeting in the S & L office on March 7, 1983 the engineering justification is available for review at S & L for node points 1696H and 1713D.

Item 4.a

Your response to Item 4.a does not completely address our concern. We acknowledge your prompt corrective action on the disposition of the cable reels since the date of the inspection. However, the cable reels had been found potentially nonconforming during a receipt inspection on October 2, 1979. Contrary to your response, your site personnel reported that reel #20BR was completely installed and 16BR was partially used, prior to resolution of this issue. As a result, prompt and effective corrective action was not evident. Your Q.A. commitments require that nonconforming items be identified, documented, tagged and segregated for disposition in a prompt manner.

Response

As described in our original response (Reference (b)), the cable on the subject reels was acceptable based on the sign off of the CECO MRR. In Reference (c) as stated above, it appears that your concern is with the cable reels. Our concern is for the integrity of cable and not the reels, unless the reels were damaged sufficiently enough to jeopardize the acceptability of the cable. By virtue of the sign off of the MRR we have indicated the acceptability of the cable.