



Commonwealth Edison

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March 28, 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: LaSalle County Station Units 1 and 2
Response to Inspection Report Nos.
50-373/82-57 and 50-374/82-24
NRC Docket Nos. 50-373 and 50-374

Reference (a): R. L. Spessard letter to Cordell Reed
February 28, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. F. Maura, K. Naidu and M. Ring on November 29 and 30, December 1-3, 14-17, 1982, and January 11 and 12, 1983 of activities at LaSalle County 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 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.

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

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - LSCS

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Response Inspection Report Nos.

50-373/82-57 and 50-374/82-24

Item of Non-Compliance

1. 10 CFR 50, Appendix B, Criterion V "Instruction, Procedures and Drawings," states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures and drawings."

Morrison Construction Company Standard Operating Procedure, PC-16, Revision 10, entitled "Erection of Support-Restraints and Final Installation Verification" in Paragraph 6.0, System Interruptions, Supports-Restraints states:

"6.1 When a completed-documented support-restraint is required to be temporarily removed for construction reasons MCCo personnel will function as follows:

6.1.1 An MRD (Mechanical Revision Directive) Form EC-41 will be implemented to control the removal and/or replacement activities."

Contrary to the above, completed-documented support-restraints RIA2-2995S, RIA2-2999S, RIA2-2998S and LP02-2824S were temporarily removed for construction reasons without implementing a MRD. Additionally, restraints RIA2-2995S, RIA2-2999S, and RIA2-2998S did not have production drawings reissued to document disassembly and reassembly requirements. Consequently, no documentation existed to control the disassembly and reassembly of these support-restraints.

Response

Corrective Action Taken and Results Achieved

The above subject supports have been reinstalled and inspected. Their disassembly took place prior to final line walk inspection and verification of the supports/restraints on the applicable subsystems per Morrison Construction Company (MCCo) Standard Operating Procedure PC-43. Subsequently, as required by the above procedure, all the supports in the subsystem have been verified to be installed per the A.E. issued drawings. Ongoing final linewalk verifications will verify no other similar disassembled supports/restraints exist.

Corrective Action Taken to Prevent Recurrence

The below listed actions have been implemented by Morrison Construction Company.

1. A Corrective Action Request (CAR) relative to supports being dismantled without following the requirements of Standard Operating Procedure PC-16 has been initiated. Applicable engineering and field supervisory personnel have been reinstructed to the procedure requirements. Additionally, a directive was issued to all field personnel detailing instructions on the correct procedure to follow should it be necessary to temporarily dismantle or remove a support.
2. Procedure PC-43 has been revised to specify that any revision to a completed Linewalk/Inspection package cannot be effected until the required revision documents have been assembled by the Morrison Construction Company Engineering Department.

In addition to the above, a letter has been written to all site contractors stating that completed plant components must not be temporarily removed until the proper authorization has been received.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved as of April 1, 1983.

Item of Non-Compliance

2. 10 CFR 50, Appendix B, Criterion X "Inspection," states in part: "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures and drawings for accomplishing the activity."

The Commonwealth Edison Company Q.A. Manual in Quality Requirements No. 10 states in part: "Inspection Programs will be established to provide assurance that the quality control surveillance, inspections and tests defined...are performed. Quality Assurance inspections and testing will be conducted...at the site during construction...to verify conformance to applicable drawings, instructions and procedures as necessary to verify quality."

Contrary to the above, the mechanical contractor's QC inspectors signed Weld Data Reports even though incorrect operations were performed on spool piece 2RH 56 B 18" - 1 RHX 2019. A stainless steel gamma plug was screwed to a carbon steel pipe, welded with an inappropriate weld procedure specification utilizing an incorrect weld rod, and the weld nondestructively examined with an inappropriate test procedure. Additionally, several paper work type discrepancies existed in the Weld Data Reports which went undetected during the QC inspection.

Response

Corrective Action Taken and Results Achieved

The stainless steel gamma plug in the pipe spool 2RH56B-18"-1 has been replaced with the proper material and has been rewelded with the correct welding procedure. Unit #1 and Unit #2 travelers with a carbon steel pup piece welded in a stainless steel spool were reviewed and a similar problem did not exist.

Relative to the errors noted in the welding and NDE assignments, a review of all Class I and Class II large bore stainless steel pipe travelers in Unit 1 and Unit 2 has been conducted. Of the 880 travelers reviewed, approximately 3% did have minor errors but no additional problems with the production work was noted.

All the observed errors have been corrected per existing procedures.

Corrective Action Taken to Prevent Recurrence

The above referenced reviews performed substantiate that the error in the Quality Control acceptance of the installed stainless steel gamma plug was an isolated case.

A Corrective Action Request (CAR) has been written on erroneous material verifications by the Morrison Construction Company (MCCo) Engineering Department on those production documents which previously caused confusion concerning welding and NDE assignments. Engineering personnel, as a result of the CAR, have been reinstructed to more thoroughly review pertinent data on Sargent & Lundy design documents and vendor drawings prior to making the welding and NDE assignments.

The Single Weld Data Report Form has been completely revised allowing easier preparation, review and approval of welding and NDE assignments by Engineering and Quality Control personnel.

A Quality Control technical work instruction has been written to describe the requirements for Quality Control final documentation review.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved as of April 1, 1983.

Item of Non-Compliance

3. 10 CFR 50, Appendix B, Criterion XVI "Corrective Action," states in part: "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected."

The Commonwealth Edison Company Q.A. Manual in Quality Requirement No. QR 16 states in part: "A corrective action system will be used to assure that such items as failures...and nonconformances which are adverse to quality...are promptly identified and corrected... For the Project Engineering-Construction phase...on-site corrective action measure shall consist of a program for: (1) reporting nonconformances to Engineering by Construction; (2) recording nonconformances reports (NCR's) in a log for followup by site quality assurance as to resolution and satisfactory completion...(5) sign off approval and closeouts of NCR's by site quality assurance that satisfactory corrective action has been taken...NCR's submitted for resolution."

Contrary to the above, the mechanical contractor's QC personnel took inadequate corrective action by not initiating a nonconformance report. Instead, on December 2, 1982, a PC-163 form titled "Report of Missing Document" was initiated presuming only paperwork errors existed in the weld data report relative to a stainless steel gamma plug weld to a carbon steel pipe. On December 14, 1982, it was confirmed that the wrong type of material had been used, namely a stainless steel gamma plug instead of a carbon steel gamma plug. Consequently, the type of weld rod actually used, the weld procedure specification applied and the type of nondestructive examination performed becomes inappropriate for this application and is therefore erroneous.

Response

Corrective Action Taken and Results Achieved

The errors in the welding and NDE assignments led to confusion in the review and approval of Report #139, Form PC-163, on December 7, 1982. During this review, it was noted that the gamma plug heat number on the Weld Data Report was not acceptable per the corrected piping design table and weld procedure. Subsequently, additional field verifications by Morrison Construction Company (MCCo) Q.C. substantiated that the signoff of Report #139, Form PC-163 was in error and a NCR was subsequently written on December 16, 1982 to remove the stainless gamma plug. It should be noted that these verifications appear to have made in parallel with the NRC inspector's checks.

Report #139 has now been revised to reflect that a NCR was required.

Corrective Action Taken to Prevent Recurrence

Personnel involved with the preparation, review, and approval of Report #139 thoroughly understand their actions and that a complete review before final acceptance of the PC-163 Form is necessary.

Date When Full Compliance Will Be Achieved

Full Compliance has been achieved as of January 12, 1983.

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