



**Commonwealth Edison**

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April 7, 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 Unit 2  
Zack Company Reportable  
Construction Deficiency 10 CFR  
50.55(e) Final Report 82-07  
NRC Docket No. 50-374

Reference (a): C. W. Schroeder letter to J. G.  
Keppler dated August 31, 1982.

Dear Mr. Keppler:

The purpose of this letter is to provide the final report on Zack  
Company Weld Records in accordance with the provisions of 10 CFR 50.55(e).

Corrective Action Plan

As reported in Reference (a), the approach to resolving the problems  
was to: 1) substantiate the discrepant shop welding records by additional  
auxiliary records (i.e. payroll, shipping notices, etc.); 2) to inspect in  
the field, the shop welds done by apparent unqualified welders, or; 3) to  
confirm the existing shop weld quality and strength by destructive testing.  
Additionally, results of the independent review being conducted by C.F.  
Braun Company would be utilized in the final resolution of this issue.

Corrective Action Plan Results

1. Zack Company officially notified Region III on September 14, 1982 that  
the potential 10 CFR 21 is withdrawn. The withdrawal was based upon  
Zack Company results of an investigation conducted on weld record  
travelers. On September 29, 1982, Zack Company sent their report,  
"Investigation Into Apparent Discrepancies In The Weld Records  
Relative To The LaSalle Project", to Commonwealth Edison Company  
(CECo). This report detailed the basis for the Zack September 14,  
1982 10 CFR 21 withdrawal noted above. Included in the report was a  
substantiation of discrepant shop welding records and justification  
for acceptance of welding work that may have been completed by  
unqualified welders. The letters and report are on file at the  
LaSalle County Station.

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2. CECo Quality Assurance Department completed a review of those discrepant shop welding records applicable to Unit 1 and Unit 2 systems. The review is documented in Quality Assurance Department reports. For those shop welding records which indicated welding may have been done by unqualified welders, sample visual inspections were completed on installed ductwork components. A minor amount of duct shop welds did not meet procedure visual acceptance criteria. After evaluation by Sargent & Lundy Engineers, a number of visually rejected duct shop welds were repaired. Additionally, samples of visually rejected duct shop welds were destructively tested. A Sargent & Lundy Engineers report, "CQD-003490, Revision 0, Assessment of Stitch Weld Strength In HVAC Ductwork Construction", reported no cases were observed where the visually rejected shop welds failed. In all cases, the sheet metal or angle stiffening failed. On the basis of the above report, all existing duct shop welds were acceptable.
3. CECo Quality Assurance Department initiated report QAL #6706, Revision 1, dated March 16, 1983. This report requested clarification on applicability of Sargent & Lundy Report CQD-003490 to a limited number (10 cases) of shop duct welds. CECo Project Engineering Department review of QAL #6706, Revision 1 concluded Sargent & Lundy Report CQD-003490 conclusions are applicable to the cases cited in the QAL report.
4. CECo Nonconformance Report Nos. 635 and 638 were initiated and are being dispositioned to record the acceptance of Unit 2 shop welding which may have been performed by unqualified welders.
5. C.F. Braun report, "Independent HVAC Review Final Report", dated October 27, 1982, concurred with the Sargent & Lundy Engineers dated CQD-003490. Braun reported that the companion angle to duct welds as installed by the Zack Company are adequate.

Based on the above corrective actions and engineering evaluations, Commonwealth Edison believes that any shop welding which may have been completed by unqualified welders is acceptable. Sufficient inspections and reviews were completed to insure no major deficiencies exist.

To the best of my knowledge and belief the statements contained herein are true and correct. In some respects these statements are not based upon 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.

J. G. Keppler

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If there are any further questions regarding this matter, please contact this office.

Very truly yours,

*CWSchroeder 4/8/83*

C. W. Schroeder  
Nuclear Licensing Administrator

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cc: NRC Resident Inspector - LSCS  
Director of Inspection and  
Enforcement - Washington, D.C.

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