



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

May 4, 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 1
Response to Inspection Report
No. 50-373/82-47
NRC Docket No. 50-373

Reference (a): W. S. Little letter to Cordell Reed
dated April 1, 1983.

(b): L. O. DelGeorge letter J. G. Keppler
dated January 18, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. Isa Yin on September 28-30, October 7, November 9, 1982; January 11-13 and March 9-10, 1983, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. On April 28, 1983, Mr. M. Jordan of your staff granted an extension of the due date for this response from May 1, 1983 to May 4, 1983. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

Commonwealth Edison Company does not agree that the second Item of Noncompliance is a violation. As discussed in our response, however, action has been taken to address the concern of the inspector.

A review of the inspection report has revealed another topic of concern. An apparent conflict between the commitments made in Reference (b) and the reporting of the commitments (I.E. Report No. 50-373/82-47, page 13) is present. Commonwealth Edison Company's Construction Department has completed the specific commitments as outlined in the January 18, 1983 letter.

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.

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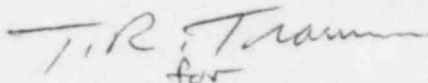
J. G. Keppler

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May 3, 1983

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

Very truly yours,

Handwritten signature of T. R. Trauman in cursive script.

for
D. L. Farrar
Director of Nuclear Licensing

CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

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Response to Inspection Report 50-373/82-47

Item of Noncompliance

1. 10 CFR 50, Appendix B, Criterion II, states in part, that "The applicant shall establish...a quality assurance program which complies with the requirements of this appendix. This program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures, or instructions. The program shall take into account the need for...verification of quality by inspection and test. The program shall provide for indoctrination and training of personnel... The applicant shall regularly review the status and adequacy of the quality assurance program. Management of other organizations participating in the quality assurance program shall regularly review the status and adequacy of that part of the quality assurance program which they are executing."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 22, dated November 1, 1982, states in Section 2, that "The quality assurance programs of Commonwealth Edison Company (CECo)...include the requirements of Appendix B to 10 CFR 50 "Quality Assurance Criteria for Nuclear Power Plants"... The requirements are implemented by means of detailed quality procedures delineating the specific methodology to be used. The overall CECo QA program, as a minimum, provides for engineering design control, audit and surveillance of onsite contractor and offsite vendors, surveillance and audit of the performance and QA procedures of the Architect Engineer and CECo Engineering, Purchasing and Construction Groups..."

Contrary to the above, the site construction department voided the approved PC-16 inspection program for the pipe whip restraints (WR) without QA and Corporate management concurrence and without the required procedural changes. In addition, Walsh Technical Company engineering personnel were used to perform WR measurements without the required personnel qualification and training and without establishing their independence from project construction control.

Response

Discussion

Commonwealth Edison Company (CECo) accepts this Item of Noncompliance. We offer the following clarifications to the inspection report for the public record. Only one (1) aspect of the Morrison Construction Company (MCCo) standard Operation Procedure, PC-16, "Erection of Supports - Restraints and Final Installation Verification", Revision 9, dated March 1981 had been voided by CECo Construction. This aspect was the PC-122 form, "Dimension Checklist", which documented whip restraint

evaluation, gap and L-dimension. PC-16 aspects utilizing Quality Control acceptance inspection forms PC-120, "Weld Data Report", (documents fit-up, welding, welding inspection, material type, piece mark and NDE), PC-121, "Installation Checklist", (documents bolting), and PC-123, "Installation Checklist - G.E." (documents G.E. bolting), plus Quality Control acceptance verification of authorized Mechanical Revision Directive (MRD) were completed for all whip restraints and included in the final documentation package. The "Q.C. Data Review Log", form PC-120A was used to verify the Final Q.C. acceptance had been accomplished on the above documents. In place of the PC-122 form, qualified technical engineers or surveyors took A/E specified elevations, gaps, L-dimensions, tension arm angles, tension arm lengths or other requested data. Commonwealth Edison Company believes the quality of whip restraint installation was improved by this practice since more dimensional information was taken and evaluated by the A/E.

It should be noted that Morrison Construction Company (MCCo) in September, 1980, submitted a final linewalk verification form which was to include as-built verifications by MCCo Q.C. This form, which was submitted per Q.P. 5-1, was determined in December, 1980 not to be required.

The noncompliance was failure to document this practice in the procedure. This failure to document the established practices was an oversight by CECo Construction and corrective action measures have been taken.

Corrective Action Taken and Results Achieved

The following corrective actions have been taken:

- (1) Morrison Construction Company completed an internal audit of M-Tels to ascertain if any further generic application of specific design information had taken place. The results of this audit are reported in a January 27, 1983 letter to Commonwealth Edison Company. No significant problems existed.
- (2) Morrison Construction Company completed an internal audit of structural details similar to the missing stitch weld to ascertain if any further detail work had not been installed. The results of this audit are reported in a December 17, 1982 letter to Commonwealth Edison Company. No significant problems existed.
- (3) A November 11, 1982 letter (DSL #164) was issued by the Site Project Construction Superintendent to all CECo construction personnel stressing the importance of adherence to procedures and obtaining approval of procedural changes prior to implementing changes. Additionally, a review session was held on this letter with CECo construction personnel on January 6, 1983.

- (4) PC-16, "Erection of Supports - Restraints and Final Installation Verification" has been revised, approved and implemented to more clearly define the Units 1 and 2 whip restraint installation and quality control verification/acceptance activities.
- (5) A site interface procedure, LSQP 3-2 has been written, approved and implemented to more clearly define as-built taking activities and responsibilities.
- (6) A 20% reverification sample of the technical engineers dimensional data was completed in January, 1983. The scope of this reverification sample was documented in CECo's letter of January 18, 1983. Commonwealth Edison Company concludes the reverification sample shows the technical engineers dimensional data to be very reliable and accurate.

Corrective Action Taken to Avoid Further Noncompliance

Many of the above corrective actions implemented above will preclude further noncompliance. The instruction/review session by the Site Project Construction Superintendent to CECo construction personnel stressed the importance of procedure adherence. The revisions to PC-16 ensure quality control verification/acceptance of all whip restraint aspects. The interface procedure will ensure necessary responsibilities are assigned for taking as-builts. Commonwealth Edison Company believes the above actions correct the root causes and will preclude further noncompliance.

Date When Full Compliance Will Be Achieved

All corrective actions have been completed.

Item of Noncompliance

2. 10 CFR 50, Appendix B, Criterion XVI, states, in part, that "Measures shall be established to assure that conditions adverse to quality... are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 21, dated June 6, 1982, states in Section 15, that "A corrective action system will be used to assure that such items as failures, malfunctions, deficiencies, deviations, defective material and equipment and nonconformances which are adverse to quality and might affect the safe operation of a nuclear generating station are promptly identified and corrected... Implementation of corrective action will be accomplished at the source of deficiency by appropriate contractor personnel as directed by cognizant Edison Engineers. Project or Station Construction, as applicable, has responsibility for implementation of the correction. Quality Assurance is responsible for follow-up and final approval that the nonconformances have been corrected satisfactorily."

Contrary to the above, the Field Change Request (FCR) system was used to document and resolve noncompliance pertaining to design requirements. This action bypassed site nonconformance control provisions which include identification, separation, evaluation, and preventative actions.

Response

Discussion

The wording on FCR No. 630 should not be interpreted as an attempt to circumvent the Nonconformance Report system, short circuit the management deficiency trending evaluation and hinder corrective measure initiation program systems. Commonwealth Edison Quality Procedure 3-2 requires the submittal of as-built data via a FCR. As-built data was required by the A/E to enable a final check of installed whip restraints against theoretical design. It was recognized by both CECO and the A/E that erection of whip restraints to theoretical dimensions while allowing the two (2) end points to vary via installation tolerances, was a very difficult task. Thus, the need existed for an A/E check of as-built elevations, gaps, L-dimensions, tension arm angles and lengths. The A/E reviews of the submitted FCR's resulted in only minor whip restraint revisions, with no obvious trends or need for action to prevent recurrence of unacceptable installation. Commonwealth Edison Company considers an A/E review of the FCR as-built data a very conservative approach to ensuring the design intent is met.

Commonwealth Edison Company does not intend this item to become a major issue between us and the NRC. Consequently, we have included in our LSQP 3-2 interface procedure a statement regarding submittal of as-built data which may be deemed nonconforming. Where as-built data represents a readily apparent nonconforming condition, a CECO Non-Conformance Report will be utilized to transmit the as-built data. This procedure has been written, approved and implemented.

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Item of Noncompliance

3. 10 CFR 50, Appendix B, Criterion V, states, in part, that "Activities affecting quality shall be prescribed in documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures, or drawings."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 21, dated June 6, 1982, states in Section 5, that "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, specifications, or checklists. These documents will assist personnel in assuring that important activities have been performed. These documents will also reference applicable acceptance criteria which must be satisfied to assure that the quality related activity has been properly carried out."

Contrary to the above, the licensee failed to implement all of the requirements contained in the Hot Line Walk Inspection Procedure. Areas excluded included line inspection at maximum operating temperature and documentation of nonconformances in Nonconformance Reports.

Response

Discussion

Commonwealth Edison Company agrees that all the written requirements contained in the Hot Linewalk Inspection Procedure were not strictly implemented. The public record should be clarified to note that the "third" inspection was performed, but could not be completed at "maximum operating temperature" without exposing personnel to unacceptable safety hazards. Actual inspection temperatures were recorded on data sheets and reported to the A/E.

Corrective Actions Taken and Results Achieved

- (1) Nonconformance Report No. 82-03, dated October 12, 1982, was initiated, evaluated and dispositioned. This NCR reported certain aspects of Hot Linewalk Inspection Procedure, Revision 1, related to reporting non-conforming conditions which were not adhered to per procedure.
- (2) Hot Linewalk Procedure, Revision 1 has been rewritten and approved to more clearly define the procedural requirements and actions for inspecting whip restraint hot gaps.
- (3) Cold and hot gap measurements were retaken utilizing approved procedures on the accessible whip restraints requiring specific gap clearance as outlined in Commonwealth Edison's January 18, 1983 letter to Mr. J.G. Keppler. The results have been reported to Sargent & Lundy Engineers. By an April 6, 1983 letter, Sargent & Lundy Engineers reported that all reverified whip restraints have acceptable hot gaps with the exception of R-87. A 1-inch shim must be added to R-87 in order to restore the design margin from 1.6 to greater than 2.

Corrective Action Taken to Avoid Further Noncompliance

The revisions to Hot Linewalk Inspection Procedure, Revision 1 which more clearly define the procedural requirements and actions for inspecting whip restraint hot gaps should preclude further noncompliance in this specific case. Additionally, the Site Project Construction Superintendent reviewed the noncompliance actions with the specific engineer responsible for whip restraint hot gaps. Overall, the Site Project Construction Superintendent issued a letter (DSL #164), dated November 11, 1982, stressing the importance of procedural adherence.

Date When Full Compliance Will Be Achieved

All actions described above have been completed with the exception of the addition of a 1-inch shim to R-37. The shim will be added no later than startup following the first refuel outage.