



**Commonwealth Edison**

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

September 30, 1983

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

Subject: Braidwood Station Unit 1  
Response to IE Inspection Report  
No. 50-456/83-13  
NRC Docket No. 50-456

Reference (a): W. S. Little letter to Cordell Reed  
dated September 2, 1983

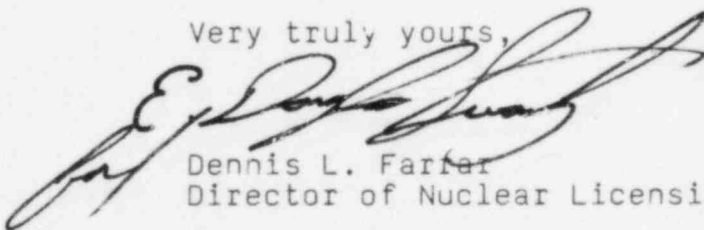
Dear Mr. Keppler:

Reference (a) provided the results of an inspection conducted by Mr. R. Mendez of your office during the period of August 15 through 18, 1983, of activities at our Braidwood Station. During that inspection, certain activities appeared to be in noncompliance with NRC requirements. The Attachment to this letter provides the Commonwealth Edison Company response to the Notice of Violation as appended to Reference (a).

To the best of my knowledge and belief, the statements contained 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 employees and Consultants. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address any questions that you or your staff may have concerning this matter to this office.

Very truly yours,



Dennis L. Farber  
Director of Nuclear Licensing

Attachment

cc: RIII Inspector - Braidwood

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## ATTACHMENT

### Commonwealth Edison Company Response to Notice of Violation

#### VIOLATION

10 CFR 50, Appendix B, Criterion III, states in part, "Measures shall be established to assure the applicable regulatory requirements and the design basis,...for those structures, systems, and components...are correctly translated into specifications, drawings...and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled...measures shall include the establishment of procedures among participating design organizations for the review...of documents involving design interfaces".

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations, Revision 15, states in part, "...designs and materials will conform to...standards, regulatory requirements...and appropriate quality standards are applicable...design evaluations or reviews are conducted to written standards and include consideration of quality standards, quality assurance requirements,...interface control...as appropriate".

Contrary to the above, it appears that inadequate design control resulted in incorrect connections to safety related instrumentation. Sargent and Lundy (S&L) drawing No. 6577-P-1PL84JB specifies high and low tubing connections to eight flow instruments on panel 1PL84JB, however, this was not consistent with the connections at the orifice plate on S&L drawing No. M-828. As a consequence, differential pressure instruments 1FT-AF012, 1FT-AF014, 1FT-AF016, 1FT-AF018, and flow instruments 1FI-AF022, 1FI-AF024, 1FI-AF076 and 1FI-AF028 were installed, such that the instrument tubing connections were reversed.

#### CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

Phillips, Getschow Company has issued Field Change Order (FCO) No. 1AF563 in order to correct the reversed instrument sensing lines at instrument rack No. 1PL84JB.

#### CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

We believe that the on-site flow verification tests performed during pump runs would have identified the reversed instrument sensing lines even if the discrepancy was not identified during

initial construction. However, in order to prevent such recurrence, Sargent & Lundy will remove all flow directions and high/low pressure tap designations on all instrument location drawings. Sargent & Lundy will verify that flow directions are marked on control and instrumentation drawings (C&ID's) as appropriate. The piping contractor will use the system P&ID's and C&ID's as the governing documents for establishing flow directions.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The affected drawings M-828 Sht. 9, M-2037 Sht. 1, and M-819 Sht. 1 will be revised and issued by October 7, 1983. Repiping of the instrument sensing lines are expected to be complete by October 31, 1983. The location drawings and C&ID's will be revised as necessary and issued by October 31, 1983.

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