



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

January 3, 1984

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

Subject: LaSalle County Station Units 1 and 2  
Response to Inspection Report  
Nos. 50-373/83-46 and 50-374/83-39  
NRC Docket Nos. 50-373 and 50-374

Reference (a): J. F. Streeter to Cordell Reed  
dated November 16, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. R. D. Lanksbury, S. G. DuPont, and D. Williams on September 20 through November 1, 1983, of activities at LaSalle County Station. Although reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements, no response to the item of noncompliance was required because adequate corrective action had already been taken. Reference (a), however, did request that a response be provided regarding a generic concern of construction OAD work activities. Although no date for response was specified, on December 16, 1983, C. W. Schroeder, R. D. Walker, and L. Reyes agreed that January 3, 1984 was an acceptable due date.

We note that there was no reference in the Inspection Report to System OAD's Electrical Construction Test Procedures Manual. It appears that the inspector may have been unaware of the existence of this manual. Attached please find Commonwealth Edison Company's response to the item of generic concern.

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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Q PDR

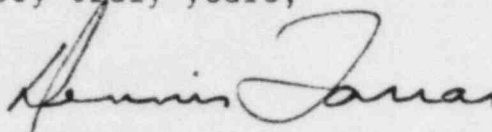
H. R. Denton

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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 dark ink, appearing to read "Dennis J. Farrar". The signature is fluid and cursive, with a large initial "D" and "J".

D. L. Farrar  
Director of Nuclear Licensing

CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

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## RESPONSE TO INSPECTION REPORT

NOS. 50-373/83-46 and 50-374/83-39

### ITEM OF CONCERN

#### (Cover letter)

In addition to the apparent item of noncompliance, another matter of concern regarding your construction OAD is addressed in Paragraph 6 of the attached inspection report. Specifically, activities affecting quality appear to be being performed by construction OAD without adequate written procedures and without maintaining adequate documentation of the work they have performed. Therefore, please respond to this concern and address any plans or actions you contemplate to resolve this perceived programmatic weakness. This is a generic concern; therefore, please ensure your response addresses construction OAD's activities at all of your construction sites.

#### (Paragraph 6)

Additionally, the inspector identified the following concerns. The original construction inspection was performed by construction OAD, as documented by Electrical Data Form #1-Motors, dated April 15, 1983. Form #1 is performed by construction OAD without a prescribed instruction but by "craft knowledge" with a qualified construction technician. In addition, the construction OAD program does not require form #1 and other construction OAD forms to be updated with supplemental information after maintenance has been performed on installed and tested components. Because of the lack of instructions or supplemental documentation, the option of inspection by QC/QA is not afforded except by review of the completed deficiency report, which does not adequately document what portions of the original OAD form were re-performed to satisfy post maintenance inspections.

In the inspection report transmittal letter, CECO was requested to respond to this concern and describe what actions are planned or contemplated to insure that OAD's work is performed in accordance with adequate written instructions and that adequate documentation of the work they perform is maintained.

This concern will be followed by this office at other Commonwealth Edison construction sites and is being addressed as a generic issue. This is an Open Item (374/83-39-02(DE)).

### Response

Open Item 374/83-39-02 (DE) states that "...Form #1 is performed by construction OAD without a prescribed instruction, but by "craft knowledge" with a qualified construction technician".

OAD Construction test activities are delineated in the System Operational Analysis Department Electrical Construction Test Procedures Manual. Form #1 is included in ECTP #1.

Open Item 374/83-39-02 (DE) also states that "...the construction OAD program does not require Form #1 and other construction OAD forms to be updated with supplemental information after maintenance has been performed on installed and tested components."

POAD currently does perform reverification after rework (maintenance) is performed on an item they have previously tested. Currently, the reverification is documented on the contractors rework request via a stamp signed by the engineer signifying retesting is complete, or on a deficiency. The actual type of testing performed is not documented. The System Operational Analysis Department Electrical Construction Test Procedures will be enhanced to delineate minimum documentation requirements when reverification of a previously performed test is necessary due to rework or maintenance. Completion date for this enhancement is January 16, 1984.

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