



Commonwealth Edison

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

DMB

April 6, 1984

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

Subject: Braidwood Station Units 1 and 2
10 CFR 50.55(e) 30-Day Report
Radiograph Film Density
NRC Docket Nos. 50-456 and 50-457

Dear Mr. Keppler:

On March 6, 1984, the Commonwealth Edison Company Project Management Department notified Mr. L. McGregor of your office of a deficiency pursuant to 10CFR50.55(e) regarding out of tolerance radiographic film densities at our Braidwood Station. For your tracking purposes, this deficiency was assigned Number 84-04.

This letter fulfills the thirty (30) day reporting requirements of 10CFR 50.55(e) regarding this matter and is considered to be an interim report.

Description of Deficiency

Upon re-review of radiographic film representing pipe weldments, it was noted that certain views of the film contained out of tolerance densities. The initial discrepancy had been found in a limited number of field-shot, site evaluated radiographs. Initial investigation seemed to indicate that one (1) individual was responsible for the questionable density interpretations for radiographs taken prior to September of 1979 (up to construction shutdown). Reviews (after 50.55(e) notification) of all radiographs shot prior to September, 1979 also indicated the presence of some marginal interpretations of film indications.

The re-review of film was then expanded to include all radiographic film including welder qualification testing radiographs through 1979 reviewed by all active film reviewers, all film interpreted by the questionable reviewer through 1980, and a sample of film reviewed by all others through 1980. It now appears that the questionable calls were limited to the one (1) reviewer and all film accepted by him is being reviewed.

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Corrective Action Taken

The results of the re-review completed to date by qualified Level II Interpreters and Level III personnel as necessary are as follows:

Total number of Weld Radiographs reviewed for densities and indications:

297 Welder Coupons
762 Field (Production) Radiographs
1,059 Weld Radiographs

Total Number of Weld Radiographs found Acceptable:

284 Welder Coupons
700 Field (Production) Radiographs
984 Radiographs

Total Number of Weld Radiographs Rejected:

11 Welder Coupons
64 Field (Production) Radiographs
75 Weld Radiographs Rejected

Total radiograph packages yet to be reviewed from time span in question:

83 Weld Radiographs

NOTE: The date of the first package examined (first field shot radiograph) is July 27, 1976. The date of that latest radiographic package examined is April 14, 1980.

The review of film will continue until all identified packages from the initial time span are completed and the review of film by chronological sequence will continue until confidence is gained that all the questionable calls have been re-reviewed.

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Any pipe welds whose radiographic film record was out of tolerance on density or contained questionable indications will be re-radiographed. Any necessary repairs will be accomplished. Any welder coupons whose radiographic film record was out of tolerance on density or contained questionable indications will be re-radiographed if possible, and all welder coupon radiographs will be evaluated for potentially significant deficiencies.

Analysis of Safety Significance

Analysis to date has not revealed any deficient pipe welds in place, only questionable radiographs. Any weldments determined to be unacceptable after re-radiography will be brought into compliance. Radiographs found out of density could mask potential flaws. Such a circumstance, given the right conditions could potentially lead to weld failure and subsequent loss of the affected system's function. The end result would be an unnecessary challenge to the safety equipment of the plant.

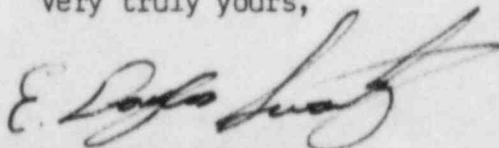
Date for Completion of all Corrective Action

Completion of film review is forecast for May 1, 1984. Completion of required re-radiographing will be as soon as practical after completion of review. Completion of any resulting rework will follow the review of resulting radiographics as soon as practical. Evaluation of effects of welder coupon radiographs will be complete as soon as practical after film reviews are complete.

Therefore, this report is considered an interim report with a final report to follow after completion of all required corrective actions.

Please address any questions concerning this matter to this office.

Very truly yours,



E. Douglas Swartz
Nuclear Licensing Administrator

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cc: Region III Inspector - Braidwood
Director of Inspection and Enforcement
Washington, D.C. 20555

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