



Commonwealth Edison
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DMB

October 2, 1984

Mr. James G. 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
ASME Material Procurement Documentation
NRC Docket Nos. 50-456/457

Dear Mr. Keppler:

On August 28, 1984, Commonwealth Edison Company notified your office of a potential deficiency reportable pursuant to 10 CFR 50.55(e) regarding the adequacy of ASME Material Procurement Documentation. This letter provides information concerning this matter to fulfill the thirty day reporting requirement and is considered an interim report. For tracking purposes, this deficiency was assigned Number 84-16. Delay in submitting this report was discussed with Mr. R. F. Warnick, of your office, on September 27, 1984.

DESCRIPTION OF DEFICIENCY

A sample review of records of past site procured ASME material has indicated that the records do not always indicate that the material was supplied in accordance with the ASME Material Manufacturers and Material Suppliers Quality System Program requirements. Program statements or ASME Quality System Certificates are not always referenced on the documents received with the material. However, the documentation does support the material specification requirements. The initial sample reviews indicated that approximately 50% of the purchases prior to 1981 are affected.

The problem with the records was partially identified in 1981 but adequate measures were not established to control the materials and provide complete corrective action to the identified records. An initial review has indicated the following areas

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contained inadequacies which could have caused the problem:

1. Quality requirements included on Site Procurement Records.
2. Documentation reviews during receipt inspections.
3. Inadequate corrective action for ASME material suppliers removed from CECO ABL.

ANALYSIS OF SAFETY IMPLICATIONS

The failure of the documentation to support the Quality System Program requirements could lead to installed materials not meeting the specification and referenced ASME Section III Code Requirements.

CORRECTIVE ACTION TAKEN

Commonwealth Edison NCR 655 has been initiated to track and document the resolution of this deficiency. A review of site purchased ASME materials will be initiated to identify the certifications and vendors involved. A program will be developed to bring the materials into compliance with the requirements of ASME Section III. The program will include provisions to perform one or more of the following:

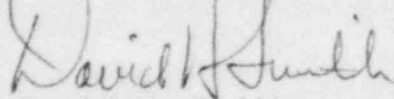
1. Obtaining revised or additional documentation.
2. Verifying Quality System Programs.
3. Implementing Code Case N-242.
4. Upgrading Stock material.

Based upon initial reviews of the records, on-site procured ASME materials received prior to October 27, 1981 still in stock have been put on hold until further reviews can be accomplished. These materials will remain on hold until the records are determined to be acceptable or until the corrective actions to bring the materials into compliance with all the requirements of ASME Section III are complete. Attachments to site purchase orders including quality requirements and revised receipt inspection checklists which were implemented by October, 1981 appear to have corrected the previous problems. This will be verified by the overall corrective action.

If the continuation of the program indicates a need for a status change, an additional report will be submitted. A report will also be submitted when the review of records is approximately 25% complete, which is expected in approximately 30 days.

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

Very truly yours,

A handwritten signature in dark ink, appearing to read "David H. Smith". The signature is written in a cursive style with a large, looped initial "D".

David H. Smith
Nuclear Licensing Administrator

cc: NRC Resident Inspector - Braidwood

Director of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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