



Commonwealth Edison

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Address Reply to: Post Office Box 767
Chicago, Illinois 60690

September 21, 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
Response to Inspection Report Nos.
50-456/84-13 and 50-457/84-13
NRC Docket Nos. 50-456 and 50-457

Reference (a): R. F. Warnick letter to Cordell Reed
dated August 7, 1984.

Dear Mr. Keppler:

This letter is provided in response to the inspection conducted by Messrs. L. G. McGregor and R. D. Schulz on June 5 through July 6, 1984 of activities at Braidwood Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation as appended to Reference (a) is provided in the enclosure.

Our delay in submittal of this thirty-day report until September 21, 1984, was discussed with Mr. R. F. Warnick of your office on September 5, 1984.

Very truly yours,

Dennis L. Farrar
Director of Nuclear Licensing

Enclosure

cc: NRC Resident Inspector - Braidwood

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ENCLOSURE

COMMONWEALTH EDISON COMPANY

RESPONSE TO INSPECTION REPORT

50-456/84-13 AND 50-457/84-13

456-457/84-13-08

ITEM OF NONCOMPLIANCE

1. 10 CFR 21.31 states, "Each individual, corporation, partnership or other entity subject to the regulations in this part shall assure that each procurement document for a facility, or a basic component issued by him, her or it on or after January 6, 1978 specifies, when applicable, that the provisions of 10 CFR Part 21 apply."

Contrary to the above, procurement documents, numbers 252162, 254434, 259782, 262155, 265347, and 270934 did not specify that the provisions of 10 CFR Part 21 apply for heat shrink tubing required to be in compliance with IEEE 383-1974 for aging, radiation, and LOCA environments.

RESPONSE:

Commonwealth Edison Company agrees that the procurement documents identified were not stamped with the appropriate stamp. However, documentation received with the subject heat shrink tubing did contain 10 CFR Part 21 reporting requirements.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

All procurement documents for the vendor in question have been reviewed for the applicability of 10 CFR Part 21.

Change orders have been issued to the appropriate procurement documents to include the 10 CFR Part 21 provisions.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

The importance of including the required statements on procurement orders has been re-emphasized to review personnel. Also, Quality Assurance Supervisory Personnel are providing an additional review of procurement orders.

DATE OF FULL COMPLIANCE:

Full compliance has been achieved.

COMMONWEALTH EDISON COMPANY
RESPONSE TO INSPECTION REPORT
50-456/84-13 AND 50-457/84-13
456-457/84-13-09

ITEM OF NONCOMPLIANCE:

2. 10 CFR 50, Appendix B, Criterion IX, states in part, "Measures shall be established to assure that special processes, including welding... are controlled and accomplished...using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Sargent and Lundy drawing 20E-0-3251, Revision AC and L. K. Comstock Procedure 4.3.3 dated January 29, 1982, require the use of E60 series weld rod for cable pan welds.

Contrary to the above, nine L. K. Comstock filler metal withdrawal authorization forms documented the release of E7018 weld rod for cable pan welds between May 25, 1982, and July 28, 1982.

RESPONSE:

Commonwealth Edison agrees that a procedure violation occurred. However, our review indicates that the welds made with either E60 or E70 series weldrod are technically acceptable and will not result in any hardware problems in the field for the following reasons:

1. The heat numbers identified are acceptable heat numbers traceable to valid certification papers.
2. The welds made utilizing either of these electrodes meets or exceeds the strength requirements specified by AWS D1.1-1975.
3. The welders making these welds were qualified to use either filler metal.
4. Welding always required a 100% visual inspection and any unacceptable welds would have been identified.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

LKC NCR #3275 has been issued to identify and disposition the procedure violation.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

L. K. Comstock Procedure 4.3.10, Storage, Issue and Control of Welding Material, has been revised to amplify and clarify the control of weld filler metal. Personnel responsible for weld rod control have been trained in this procedure revision.

DATE OF FULL COMPLIANCE:

Disposition of NCR #3275 is expected by November 16, 1984.

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