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AMB

October 22, 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) Interim Report
G. K. Newberg Welding Program Deficiencies
NRC Docket Nos. 50-456/457

References (a): D. H. Smith letter to J. G. Keppler dated
September 10, 1984.

Dear Mr. Keppler:

On August 10, 1984, the Commonwealth Edison Company notified your office of a potential deficiency reportable pursuant to 10 CFR 50.55(e) regarding deficiencies in the Gust K. Newberg welding program at our Braidwood Station. Reference (a) provided information concerning this matter to fulfill the thirty day reporting requirement. For tracking purposes this deficiency was assigned Number 84-15. The purpose of this letter is to revise the description of the deficiency to include Shielded Metal Arc Welding (SMAW) and update the status of corrective actions.

DESCRIPTION OF DEFICIENCY

A review of Gust K. Newberg welding has revealed some inconsistencies in the Gust K. Newberg welding program. These inconsistencies can be categorized as 1) Gust K. Newberg engineers specified AWS weld process specifications (WPS) that had not been incorporated into the Gust K. Newberg welding procedure for flux core welding, specified improper WPS's, or did not specify WPS's for all joints, 2) Gust K. Newberg ironworkers welded to AWS pre-qualified details that were not approved by Sargent & Lundy for the flux core procedure or were not specified by the Gust K. Newberg engineer, and 3) Gust K. Newberg ironworkers listed procedures on traveler packages as being used that they did not use or did not list all WPS's used.

Investigations indicate that the problem is confined to cover plate installations in Unit 1 and Unit 2 Containments, and box beam end connection modifications in the Unit 1 Containment. Based on applicable Structural Steel Traveler Packages (SSIT) reviewed to date, documentation problems occur, in varying combinations, in approximately 82% of the Flux Core Arc Welding (FCAW) SSIT's and 18% of the SMAW SSIT's.

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STATUS OF RESOLUTION

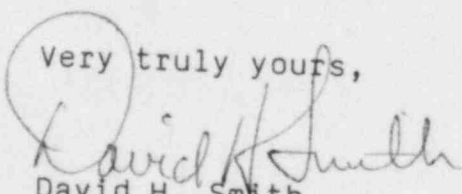
To date, 320 SSIT's have been reviewed. Based on the results of these reviews, Commonwealth Edison continues to believe that the problems relate to documentation only and that no associated physical defects exist. This belief, as previously stated in Reference (a), is based on the following:

1. The welders involved were qualified according to American Welding Society (AWS) to use all welding processes involved.
2. The weld joints detailed by engineering and installed in the field conform to AWS pre-qualified details.
3. The welding processes used were pre-qualified by AWS and the size and type of electrodes used were limited, thereby limiting the variables available to the welder.
4. Electrode wire size, voltage, and amperage parameters are the same for all FCAW and SMAW welds regardless of joint detail or orientation.
5. All welds were visually inspected and in some cases, Nondestructive Examinations (NDE) were conducted. No physical defects were identified.

SSIT review to identify and correct document deficiencies will be part of the Gust K. Newberg final document review program. This program, which will be conducted in accordance with Gust K. Newberg Procedure 29, should be initiated by the end of October. Program completion is scheduled for January 15, 1985. A status report will be submitted following completion of the SSIT reviews.

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

Very truly yours,


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