



Commonwealth Edison

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November 28, 1984

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

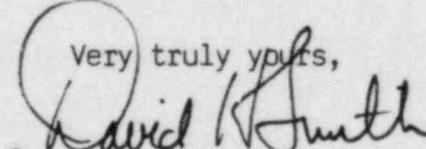
Subject: Braidwood Station Units 1 and 2
Response to Inspection Report
Nos. 50-456/84-17 and 50-457/84-17
NRC Docket Nos. 50-456 and 50-457

Reference (a): R. F. Warnick letter to Cordell Reed
dated October 16, 1984.

Dear Mr. Keppler:

This letter is provided in response to the inspection conducted by Messrs. L. G. McGregor, R. D. Schulz and J. F. Schapker of your office on July 7 through August 31, 1984, of activities at our 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 to this letter. As noted in Reference (a), no response to the Notice of Violation Item 3 was required. The delay in providing this response was discussed with Mr. P. R. Pelke of your office on November 15, 1984.

Should you or your staff have any questions regarding this matter please contact this office.

Very truly yours,

for Dennis L. Farrar
Director of Nuclear Licensing

Enclosure

cc: NRC Resident Inspector - Braidwood

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RESPONSE TO INSPECTION REPORT

50-456/84-17 AND 50-457/84-17

456/84-17-01; 457/84-17-01

ITEM OF NONCOMPLIANCE

1. 10 CFR 50, Appendix B, Criterion V, states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Commonwealth Edison Quality Assurance Manual requires in Q.P. No. 4-1 that bidders be approved and placed on the approved bidders list, that purchase orders be reviewed and accepted by the quality assurance department to assure that the necessary technical and quality requirements are included in the procurement documents, and that the procurement is being made from the plant location for which the Quality Assurance Program is approved.

Contrary to the above, on May 17, 1981 and July 9, 1981, Commonwealth Edison placed purchase order numbers 730091 and 254379, respectively, with an unapproved bidder that did not have an approved quality assurance program. The purchase orders were for the cleaning of 206,744 feet of safety-related piping, which was to be installed in ASME Section III, Class NC and ND systems and safety-related instrumentation piping systems. Furthermore, the purchase orders were not reviewed and accepted by the Commonwealth Edison Quality Assurance Department to assure that the necessary technical and quality requirements were addressed, and the purchase orders had no reference to quality assurance program requirements.

RESPONSE

The chemical cleaning process was intended to remove rust and scale without affecting the pipe; as such, the process was purchased as a standard non-safety related commercial service. As a non-safety related item, these purchase orders did not require review by Quality Assurance nor was the vendor required to have a Quality Assurance Program.

RESPONSE TO INSPECTION REPORT

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456/84-17-01; 457/84-17-01

Provisions were made to maintain heat traceability during the chemical cleaning process by heat code stamping each piece of pipe to be cleaned. All return shipments of chemically cleaned pipe were received on Commonwealth Edison Material Receipt Reports and were subject to receipt inspection. The process used for chemical cleaning, although not processed as a vendor procedure, was reviewed with Sargent & Lundy on FCR L-1450 on April 22, 1981.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Safety related two inch and under pipe that was cleaned on purchase orders 730091 and 254379 have been documented on Commonwealth Edison NCR 633 Rev. 1. This item has also been reported to the NRC as 10 CFR Part 50.55(e) Report 84-10. The corrective action program for this item will include an analysis of the effects on the pipe by the chemical cleaning process.

ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The importance of services connected with safety-related items and components has been emphasized to both Project Construction and Quality Assurance groups at the site. To further ensure that the proper purchase requirements are instituted on future purchase orders, Braidwood Project Procedure PCD-07 "Site Purchasing Instructions" has been issued and implemented. PCD-07 requires that requests for material, equipment and services delineate the quality requirements and appropriate reasons for the purchase. Review of purchase requests is completed by Construction Supervisors and Quality Assurance to ensure that the necessary requirements (FSAR, Quality Assurance Manual, Safety Related, etc.) are met.

DATE OF FULL COMPLIANCE

Project Procedure PCD-07 was issued November 8, 1984. Training on this procedure was held on November 9, 1984. Full compliance has been achieved.

RESPONSE TO INSPECTION REPORT

50-456/84-17 AND 50-457/84-17

456/84-17-02; 457/84-17-02

ITEM OF NONCOMPLIANCE

2. 10 CFR 50, Appendix B, Criterion XV, states in part: "Measures shall be established to control materials, parts or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition, and notification to affected organizations."

10 CFR 50, Appendix B, Criterion XVI, states in part: "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Contrary to the above, 337,350 feet of safety-related pipe was received in 1977 and rejected on April 9, 1979 due to rust, scale, and failure to cap the pipe ends. The pipe was not placed on hold to prevent withdrawal and installation in safety-related systems. As a result, some of the pipe was installed in the plant. In addition, the rejected pipe was not properly dispositioned in that only 206,744 feet of pipe was chemically cleaned.

RESPONSE

Commonwealth Edison acknowledges the fact the subject pipe was not placed on hold to prevent withdrawal and installation after a concern was raised that it was observed to have excessive corrosion. Much of the pipe was chemically cleaned. Both pipe that was and was not chemically cleaned was installed in the plant.

It should be noted that Commonwealth Edison Company had initially identified the potential reduced wall problems with one heat number of pipe and was taking corrective steps, including determination of the scope of the issue, when NRC reviewed the issue and identified the noncompliance.

RESPONSE TO INSPECTION REPORT

50-456/84-17 AND 50-457/84-17

456/84-17-02; 457/84-17-02

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

To document and disposition the subject pipe, Commonwealth Edison NCR 633 Rev. 1 was issued to address all two (2) inch and under pipe received in 1977 from Guyon Alloys on Purchase Order 207003. This item was reported to NRC and is being tracked by 10 CFR 50.55(e) Report 84-10. Commonwealth Edison and Sargent and Lundy are presently developing a program to disposition the installed pipe and evaluate the effects of chemical cleaning. All suspect pipe in storage has been identified and placed on hold. Corrective action will be taken and reported pursuant to 10 CFR 50.55(e) Report 84-10.

ACTION TAKEN TO PREVENT FURTHER NONCOMPLIANCE

Phillips Getschow Procedure QCP B4 relating to material storage and control has been revised and enhanced since 1981. The revisions include receipt inspections, visual inspection of ends, visual inspection for rust and scale, dimensional check of wall thickness, verification of placement of protective covers, requirements for Level III outdoor storage, disposition of nonconforming materials found in storage and monitoring of storage areas. The monitoring requirements of this procedure will be effective in identifying and correcting problem conditions.

DATE OF FULL COMPLIANCE

Phillips Getschow Procedure QCP B4 revisions have been implemented.

This item of noncompliance is considered closed by Commonwealth Edison Company with the dispositioning of pipe in question being tracked by 10 CFR 50.55(e) Report 84-10.

A follow up report on the 10 CFR 50.55(e) corrective action program is expected to be submitted by December 15, 1984.