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DMS

October 15, 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
Removal of Nameplates from ASME Large
Bore Spool Pieces
NRC Docket Nos. 50-456/457

Reference (a): E. D. Swartz letter to J. G. Keppler dated
August 24, 1984.

Dear Mr. Keppler:

On July 24, 1984, the Commonwealth Edison Company notified your office of a deficiency reportable pursuant to 10 CFR 50.55(e) regarding the removal of nameplates from ASME large bore spool pieces 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 84-12. The purpose of this letter is to clarify the deficiency description and to update the status of corrective actions being taken to resolve this issue. This letter is considered to be an interim report.

DESCRIPTION OF DEFICIENCY

ASME NPT symbol nameplates were removed from piping subassemblies during installation without proper controls and documentation. Nondestructive examinations required by ASME Section III of the nameplate removal areas were not subsequently performed. In addition, the removal of ASME NPT nameplates leaves installed spool pieces without ASME Code required positive identification. This issue affects 2 1/2 inch and larger piping spools fabricated by Southwest Fabricating and Welding under Sargent & Lundy Specification L-2741.

CORRECTIVE ACTIONS BEING TAKEN

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Commonwealth Edison Company NCR No. 639 and Phillips Getschow Company NCR No. 1783 have been generated to document this item and track its resolution.

Installed large bore piping spools that do not have ASME NPT nameplates are presently being identified as part of the

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CORRECTIVE ACTION BEING TAKEN (cont'd)

Material Traceability Verification Program. Current estimates indicate that approximately 600 installed spool pieces do not have NPT nameplates attached. The estimated completion of this program for large bore pipe spools without ASME nameplates is June, 1985.

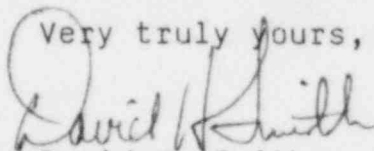
Phillips Getschow Company has developed and submitted to CECO for approval procedure PGCP-51, "Verification of Code Nameplate Data and Resolution of Discrepancies." This procedure describes the program by which the following will be accomplished;

- 1) Spools without nameplates will be positively traced using vendor fabrication documentation.
- 2) An examination of the spools without nameplates will be performed to locate nameplate removal areas.
- 3) Where nameplate removal areas have been located, ASME Section III required nondestructive examination will be performed and pipe wall thickness measurements will be made.
- 4) Any required repair to the nameplate removal area will be performed per established procedures.
- 5) With the concurrence of Commonwealth Edison Co. and the Authorized Nuclear Inspector, replacement identification plates will be attached to the installed spool pieces.
- 6) Spools for which the nameplate removal area can not be located will be dispositioned on a PGCO Nonconformance Report which will be submitted to Commonwealth Edison Company for disposition on a case-by-case basis.

An interim report updating the status of spool identification and implementation of procedure PGCP-51 will be provided by January 18, 1985.

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

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