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DMB

February 13, 1985

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 Reports Nos.
50-456/84-09 and 50-457/84-09
NRC Docket Nos. 50-456 and 50-457

- References (a): R. F. Warnick letter to Cordell Reed
dated July 2, 1984
- (b): D. L. Farrar letter to J. G. Keppler
dated July 31, 1984
- (c): R. F. Warnick letter to Cordell Reed
dated August 15, 1984
- (d): D. L. Farrar letter to J. G. Keppler
dated October 22, 1984
- (e): D. L. Farrar letter to J. G. Keppler
dated November 7, 1984

Dear Mr. Keppler:

The enclosure to this letter provides additional information regarding our response to Item of Noncompliance #1 identified in Reference (a). Our response to this item was provided in References (b), (d) and (e).

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

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

cc: NRC Resident Inspector - Braidwood

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ENCLOSURE

ADDITIONAL INFORMATION FOR

INSPECTION REPORT 50-456/84-09 AND 50-457/84-09

ITEM 456/84-09-01 AND 457/84-09-01

1. The ECN's adding improved installation clearance guidelines to the Contractor's Specifications have been implemented by each contractor. The specification guidelines require that each contractor establish a program to ensure the listed installation clearance guidelines are met.

These guidelines require the contractor to follow good workmanship and practical practices when installing or modifying components and/or materials and to consider whether reasonable clearance exists between items when installation is completed. Reasonable clearance shall be construed to mean that clearance has been provided (except where otherwise allowed for in the design documents) for items such as inspection access, maintenance access, equipment removal, repair access, functional operability of valves and equipment, and thermal expansion.

Installation of any component in direct contact with any other unassociated component (except where called for in the design documents) is not acceptable unless approved by the Consulting Engineer. This stipulation includes installation of components in direct interference with installed insulation. Instances of installation of items in direct contact with other items will be brought to the attention of the Consulting Engineer for disposition.

2. Braidwood Station Procedure BWAP 1205-11, System Turnover for Operation, was implemented January 31, 1985. This procedure provides an instruction for the station to perform a review of systems to determine acceptability for operation.

Applicable systems are reviewed by the Station Technical Staff, Maintenance Department, Operating Department and Rad/Chem Department in accordance with their review checklists. Some of the items included in these Checklists are:

- Walkdown performed to determine if any scaffolding or construction material hindering system safe operation.
- Walkdown performed to determine condition of housekeeping.
- Possible equipment removal evaluated.
- Impact on operability of other systems due to turned over condition of the system reviewed.
- Overhead attachments for lifting reviewed.
- System control cabinet door opening access checked.
- Component accessibility for maintenance walkdown performed.
- Component accessibility for operation walkdown performed.
- Sample point accessibility walkdown.

ENCLOSURE

ADDITIONAL INFORMATION FOR

INSPECTION REPORT 50-456/84-09 AND 50-457/84-09

ITEM 456/84-09-01 AND 457/84-09-01

Implementation of this procedure should insure accessibility of system components for maintenance, repair and operation.

3. Braidwood's Pre-Service Inspection (PSI) Program is intended to meet the requirements of the applicable ASME Section XI Code and 10 CFR 50.55a. The scope of the PSI Program includes all components and items ultimately to be included in the In-Service Inspection Program. This provides confidence that all required items for ISI are inspectable (because they were inspected for the PSI) or that they have been dispositioned in accordance with the provisions of 10 CFR 50.55a.