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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

APR 23 1981



Docket No. 50-454
Docket No. 50-455

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Vice President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

Thank you for your letter dated February 26, 1981, regarding cable tray weld quality at the Byron Plant. We have reviewed this letter and its attachment which documents your statistical approach towards resolving nonconforming cable tray stiffener welds identified, in part, by NCRF-529. As a result of this review, we have the following questions which require further clarification on your part.

1. Your "Weld Quality" assumption in Attachment "A", Byron Cable Tray Stiffener Weld Inspection, does not demonstrate an adequate basis to establish that weld size and quality are acceptable. NRC inspectors have observed poor quality welds in installed cable trays. These observations were not documented because our inspectors understood, based on discussions with your staff, that your inspections had identified these issues. Since according to statements in your letter weld size and quality had not been documented as nonconforming, we conclude that your analysis and evaluation are incomplete. Please provide additional evidence of adequate weld quality based on the inspection history of the aforementioned welds or other considerations. Also, please address the discrepant welds on installed cable tray stiffeners observed by NRC inspectors.
2. Your methodology for establishing a random sample as outlined in Attachment "A" is not clear. Please provide a comprehensive description of what was done to establish a random sample. Include in this description the basis for concluding that your sample is representative of the total population.
3. It appears that the statistical evaluation of the quality of these cable tray stiffener welds constitutes a change from the acceptance and quality criteria outlined in Section 3.8 (Design of Category 1 Structures) Table 3.8-2, Item No. 20 of the FSAR. Please discuss your intentions and considerations regarding compliance with this FSAR design requirement.
4. Your report concludes that based on sampling methods used, up to 1.3% defective stiffener welds may exist for safety-related cable trays at Byron

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Units 1 and 2. Please provide us additional information regarding the basis for assuming that this is an acceptable level of risk. Also in your response, please address your plans for corrective action for any specific defective welds which are identified in the future, where such welds are a part of the population that was included in the study.

Your statement in the February 26, 1981 letter that "The inspectors agreed with our approach and conclusions" represents an overstatement of our position on this issue. While we agree it is your prerogative to solve the problem in any manner of your choosing, we did not indicate that the approach and methodology would be acceptable to NRC without further review. During the initial conversations and subsequent meetings, our staff expressed several reservations in this regard, and requested that the subject report be submitted in writing for our review.

In order for us to continue our review of this matter, we request that you provide a written response within 25 days to this office addressing the questions previously discussed.

Your cooperation with us is appreciated.

Sincerely,

C. E. Norelius

C. E. Norelius, Acting Director
Division of Engineering and
Technical Inspection

cc: J. S. Abel, Director
of Nuclear Licensing
Gunner Sorensen, Site
Project Superintendent
V. I. Schlosser,
Project Manager
R. E. Querio, Station
Superintendent

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