



Commonwealth Edison

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May 15, 1985

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 Reports Nos.
50-456/85-008 and 50-457/85-008
NRC Docket Nos. 50-456

Reference (a): J. J. Harrison letter to C. Reed
dated April 18, 1985

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. D. L. Williams, A. Dunlop, M. J. Farber and M. A. Ring on February 14 through March 27, 1985 of activities at 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 is provided in the enclosure.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

Anthony Miosi
for D. L. Farrar
Director of Nuclear Licensing

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cc: NRC Resident Inspector - Braidwood

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ENCLOSURE

Response to
Inspection Report 456/85-008 and 457/85-008
Item 456/85-008-10a, 456/85-008-10b and 456/85-008-10c

Item of Noncompliance

As a result of the inspection conducted on February 14 through March 27, 1985, and in accordance with the General Policy and procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion XIII states, in part, that "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment...to prevent damage or deterioration." The Commonwealth Edison Company Quality Assurance Program contains in Quality Requirement Q.R. 2.0 a commitment to the regulatory positions of Regulatory Guide 1.37, Revision 0, Regulatory Guide 1.38, Revision 2, and Regulatory Guide 1.39, Revision 2.

Regulatory Guide 1.37, Revision 0 endorses the requirements of ANSI N45.2.1-1973, "Cleaning of Fluid Systems and Associated Components During Construction Phase of a Nuclear Power Plant." Section 6, "Maintenance of Installation Cleanliness", states, in part, "If access to a sealed system is required, precautions shall be taken to prevent introduction of contaminants. Prior to opening the seals, the immediate surroundings should be cleaned to remove solid contaminants which might be introduced in the system. Personnel entering the system should wear clean outer clothing and shoe covers. When the necessary work is completed, the interior surface shall be locally cleaned to its original condition and the system should be re-sealed."

Regulatory Guide 1.38, Revision 2 endorses the requirements of ANSI N45.2.2-1972, "Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants During the Construction Phase." Section 6.5 of ANSI N45.2.2 states, in part, that, "Items released from storage and placed in their final locations within the power plant, shall be...cared for in accordance with the requirements of Section 6 of this Standard." Section 6 of ANSI N45.2.2 states in part that, "(6.1.1) Level and methods of storage necessary are defined to minimize the possibility of damage or lowering quality due to corrosion, contamination, deterioration, or physical damage. (6.2.2) Cleanliness and good housekeeping practices shall be enforced at all times in the storage areas. (6.4.2) Items...shall have all covers, caps, plugs or other closures intact...covers removed for internal access at any time for any reason shall be immediately replaced and resealed after completion of the purpose for removal."

Appendix

Regulatory Guide 1.39, Revision 2 endorses the requirements of ANSI N45.2-3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants". Section 3.2.1 states, in part, "Garbage, trash, scrap, litter and other excess material shall be collected, removed from the job site, or disposed of in accordance with specified requirements or planned practices. Such excess material shall not be allowed to accumulate and create conditions that will adversely affect quality."

Contrary to the above:

- a. Shoe covers were not provided or worn by personnel entering the recirculation sump area during BWPT EF-11 and some debris was noted in the sump water during the preoperational test.
- b. On March 15 and 21, 1985, the permanent spool pieces for Residual Heat Removal Suction lines and Containment Spray Pump Suction lines were found with inadequate or non-existent coverings for protection from damage or deterioration of these components.
- c. On March 15 and 21, 1985, during tours of the 1A positive displacement charging pump room the following was observed; empty cans in the room cooler, plastic sheeting strewn about the area, partially eaten food items, accumulation of flammable material and a layer of dust on all equipment in the room.

Response - Part a

The cleanliness program for the EF-11 test was reviewed with the NRC prior to its implementation. Commonwealth Edison Company agrees that shoe covers were neither required by the program established nor provided or worn by personnel entering the recirculation sump area during the EF-11 test. Further, we agree that Commonwealth Edison is ultimately responsible for setting requirements and maintaining cleanliness during testing.

Prior to commencing the test the sump was hand wiped to remove any foreign material. Immediately prior to the test the sump area was again examined by EF-11 testers and the shift personnel. Some additional debris was found and removed at that time. The Inspector's observation of debris "primarily paper" was also observed by the EF-11 testers and was believed to be purge dam material.

Corrective Action Taken and Results Achieved

Upon the expression of concern by the NRC for lack of shoe covers, Commonwealth Edison took immediate action to place shoe covers in the area and to post the area to require shoe covers to be worn in the sump area for the remaining portion of the EF-11 Test.

Corrective Action Taken to Avoid Further Noncompliance

Commonwealth Edison Company will conduct training with all Start-up testing personnel. This training will apprise the start-up test engineers of this incident and of the facts that the establishment of specific requirements for cleanliness requires follow-up and that any established cleanliness requirements should be discussed during the test briefings. This training will also include a discussion of general housekeeping requirements during testing and specific training on the Project Construction Department procedure for housekeeping PCD-05, "Project Housekeeping" Revision No. 2.

Date of Full Compliance

Training will be completed by July 1, 1985.

Response - Part b

Commonwealth Edison recognizes the need to maintain piping cleanliness during installation. We acknowledge the example cited by the Inspector of tape coverings not intact. However, Commonwealth Edison believes that tape, when intact, is an adequate protective covering method.

Corrective Action Taken and Results Achieved

The referenced spool piece covers were inspected. Phillips Getschow Co. has been instructed to verify that spool piece covers are intact or to repair or replace them as necessary.

Corrective Action Taken to Avoid Further Noncompliance

Cleanliness of piping at the time of installation is verified by Phillips Getschow Co. in accordance with procedures QCP-B28 and PGCP-15. Phillips Getschow management will issue a memo to applicable foreman reminding them of requirements necessary to maintain cleanliness of piping during installation.

Date of Full Compliance

Corrective actions will be complete by June 10, 1985.

Response - Part c

Commonwealth Edison agrees there was an accumulation of debris in the 1A positive displacement charging pump room.

Corrective Action Taken and Results Achieved

Commonwealth Edison instructed the contractor responsible for cleanliness control in this area to clean the area. This area was cleaned.

Corrective Action Taken to Avoid Further Noncompliance

A letter was issued to G. K. Newberg on May 7, 1985, discussing this discrepancy and directing that appropriate field personnel be informed of this problem. In addition, the provisions of Project Procedure PCD-05 will continue to be implemented by Commonwealth Edison and site contractors.

Date of Full Compliance

All corrective actions are completed.

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