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July 2, 1985

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Dr. A. Dixon Callihan
Administrative Law Judge
102 Oak Lane
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Re: In the Matter Of: Commonwealth Edison
Company (Braidwood Nuclear Power Station,
Units 1 and 2), Docket Nos. 50-456, 50-457 *OL*

Dear Administrative Judges:

In accordance with the reporting and disclosure obligations set forth in Duke Power Company (William B. McGuire Nuclear Station, Units 1 and 2), ALAB-143, 6 AEC 623 (1973), I have enclosed a copy of a June 21, 1985 letter from D. L. Farrar, Commonwealth Edison Company Director of Nuclear Licensing, to James Keppler, NRC Regional Administrator. The letter provides Commonwealth Edison's response to Inspection Report 85-015/016, dated May 16, 1985, and it is directly relevant to issues 3.B. at page 27, 10.F. at page 39, and 12.C. at page 43 of the amended contention, as admitted by the Board in its Order of June 21, 1985.

Respectfully,

Joseph Gallo / RJX
Joseph Gallo

One of the Attorneys For
COMMONWEALTH EDISON COMPANY

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cc: Service List

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Commonwealth Edison

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June 21, 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.
50-456/85-015 and 50-457/85-016
NRC Docket Nos. 50-456 and 50-457

Reference(a): W. S. Little letter to Cordell Reed
dated May 16, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. R.D. Schulz, W.J. Kropp and R.N. Gardner on March 25 through May 3, 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. Based on actions taken to correct and to prevent recurrence of the noncompliance identified in Item 4, no response to this item of noncompliance was required.

The delay in submitting this response was discussed with Mr. W. S. Little on June 13, 1985. If you have any further questions on this matter, please direct them to this office.

Very truly yours,

Anthony W. Little
for D. L. Farrar
Director of Nuclear Licensing

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Enclosure

cc: NRC Resident Inspector - Braidwood

0297K

Response to
Inspection Report 456/85-015 and 457/85-016
Item 456/85-015-01 and 457/85-016-01

Item of Noncompliance

1. 10 CFR 50, Appendix B, Criterion II states, in part, that the quality assurance program shall provide control over activities affecting the quality of the identified structures and shall take into account the need for special controls, processes, and training to attain the required quality, and the need for verification of quality by inspection and test.

The Commonwealth Edison Company Quality Assurance Manual states in Section Q.R. No. 1.0, "Edison has prime responsibility for controlling the quality of onsite work by field contractors."

Contrary to the above, the licensee had not established an inspection program for safety-related structural beams that were modified during nonsafety-related piping installations, and had not established an adequate craft training program with regard to nonsafety-related piping installation activities resulting in field design modifications to safety-related structural steel. Three safety-related structural beams had openings cut into them to allow the routing of 4" diameter ~~nonsafety-related~~ pipe through the web of the beam.

Five inch diameter openings cut in the web areas of beams 8AB794 and 8AB799N were not permitted by any instruction, procedure, or drawing and had not been identified by the licensee or contractors through a field design change request or quality control inspection. A 6" diameter opening in the web of beam 6AB145 was stipulated on Drawing S-1293; however, a 5 1/2" X 13" oval opening was cut in the web and this nonconforming condition had not been identified by the licensee or contractors through a field design change request or quality control inspection.

Response

Commonwealth Edison Company agrees there were unauthorized modifications of structural beams for pipe penetrating them. We believe these types of situations were isolated to the building floor drain piping systems which are class D non-safety related piping systems. Additionally, these unauthorized modifications were performed some years ago, prior to the implementation of interface controls in place today.

Corrective Action Taken and Results Achieved

Sargent and Lundy has walked down the Unit 1 & 2 floor drain systems during their review for hanger designs. There are 49 affected beams. Some of the holes are not shown on the design drawings and others were cut different than drawing requirements. We plan no additional actions to determine whether further cases of this type exist in piping systems other than the floor drain system. Our action is based on the fact that there have been other structural steel review programs looking at these work practices such as Quality Control Structural Steel Review Program (QCSSR), Unit Concept Inspections and the Instrument Retrofit Verification Program (IRV). We have no knowledge of similar situations being identified through these programs and have concluded the problem is isolated to the floor drain system.

Commonwealth Edison Nonconformance Report (NCR) No. 740 has been initiated to address the identified beams.

Corrective Action Taken to Avoid Further Noncompliance

More stringent procedural controls have been put in place since the work which resulted in these deficiencies was completed. Current procedures ensure that work is completed in a controlled manner. Therefore, further corrective action is not required.

Date of Full Compliance

Corrective actions required by NCR 740 are expected to be complete by December 1985.

Response to
Inspection Report 456/85-015 and 457/85-016 :
Item 456/85-015-08

Item of Noncompliance

2. 10 CFR 50, Appendix B, Criterion X states, in part, that a program for inspection of activities affecting quality shall be executed to verify conformance with the documented drawings for accomplishing the activity.

The Commonwealth Edison Quality Assurance Manual states in Section Q.R. No. 10.0 that quality assurance inspections will be conducted at the site during construction to verify conformance to applicable drawings.

Contrary to the above, the electrical contractor inspected and accepted a junction box which was later determined to have deficiencies in the location of the anchors used for the mounting of the junction box. These anchors were accepted by the electrical contractor's inspector even though they were up to 3" from the required location specified by Sargent & Lundy drawing 20E-1-3571.

Response

~~A reinspection of junction box 1JB217R confirmed that L. K. Comstock's inspector incorrectly accepted the anchor locations.~~

Corrective Actions Taken and Results Achieved

L. K. Comstock Nonconformance Report (NCR) No. 4139 was initiated to document and track this deficiency.

All inspection activity in the area of junction box/equipment inspection for the inspector involved was halted until an evaluation could be made. Since the inspector's certification, he had inspected a total of seven (7) safety-related junction boxes. Another inspector was assigned to reinspect all seven junction boxes. No additional discrepancies were noted.

Corrective Action Taken to Avoid Further Noncompliance

Based on the results of the reinspection it has been determined that this was an isolated case and the inspector involved has performed junction box/equipment inspections in a competent manner. The inspector involved has been made aware of his mistake in this case. No further corrective action is required.

Date of Full Compliance

Completion of L. K. Comstock NCR 4139 is expected by July 1985.

Response to
Inspection Report 456/85-015 and 457/85-016
Item 456/85-015-06

Item of Noncompliance

3. 10CFR50, Appendix B, Criterion XVI, and the Commonwealth Edison Quality Assurance Manual Q.R. 16.0 require, in part, that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, the licensee's Site Q.A. organization inappropriately closed Non-Conformance Report No. 600 and as a result did not assure that conditions adverse to quality were corrected. The non-conformance report stated there was no traceability of material for twenty piping supports to a certified material test report and the non-destructive examination for some of the welds was not performed as required by the ASME Boiler and Pressure Vessel Code. Site Quality Assurance closed the non-conformance report without verifying that the supports were corrected or re-designed with regard to material traceability and non-destructive examination ASME Code requirements; and did not adequately perform reviews to assure that supports not detailed on Non-Conformance Report No. 600 did not have similar material and non-destructive examination deficiencies. The inspector subsequently identified two supports, (1CV0603V and 1RH02020R), detailed on Non-Conformance Report No. 600 and one support, (1SI03046S), not detailed on Non-Conformance Report No. 600 which were not procured and non-destructively examined in accordance with ASME Section III, Section NF.

Response

Commonwealth Edison Report (NCR) No. 600 initiated 3-13-84 identified ASME Section III Class A supports with incorrectly classified hardware and related attachments.

The disposition of NCR No. 600 was to assure that primary linear members were correctly identified on the design drawings for the listed supports. As a result of the Sargent & Lundy (S & L) review, design document changes were issued that corrected, as necessary, bills of material for listed supports. Since installation of the supports in question had not been completed, Site Quality Assurance close-out of NCR No. 600 was based on review of selected drawing changes initiated by S & L, including all drawing changes identified to have added primary linear members.

Response to
Inspection Report 456/85-015 and 457/85-016
Item 456/85-015-06

Commonwealth Edison acknowledges that, in this case, verification of corrective actions would have been more effective if the NCR had not been closed until work had progressed further on the subject supports.

Corrective Action Taken and Results Achieved

The NCR has been re-opened and a letter sent to Project Engineering requesting that the design status of all supports associated with NCR No. 600 be updated. NCR No. 600 will not be closed until proper installation of the subject hangers has been verified by Site Q.A. Completion is expected by 9-30-85.

To confirm that this was in fact an isolated case, Site Quality Assurance will review ten (10) additional Commonwealth Edison NCRs closed in the September, 1984 time frame. The review will be performed by someone other than the person who performed the initial review.

Material traceability and installation of ASME Class 1 supports were the subject of a Special Audit by Phillips Getschow (PGCo) Quality Assurance. This special audit was requested by Commonwealth Edison, and was conducted between 3-12-85 and 4-24-85. The resulting concerns identified are being addressed by corrective actions related to the PGCo Special Audit, PGCo NCR's, and Commonwealth Edison NCR 744.

Corrective Action To Avoid Further Non-Compliance

Commonwealth Edison believes this is an isolated case. However, to highlight the importance of the issue, a training session will be presented to Site Q.A. personnel involved with NCR corrective action verifications. NCR No. 600 will be discussed to stress the importance of not closing NCRs until corrective action is complete and the effectiveness of programmatic controls is verified.

Date of Full Compliance

Completion of corrective action and closure of NCR 744 is expected by December 1985. Completion of corrective action and closure of NCR 600 is expected by September 30, 1985. Completion of the review of the ten (10) additional NCR's is expected by August 15, 1985. Completion of training is expected by July 1, 1985.

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter Of.)

COMMONWEALTH EDISON COMPANY)

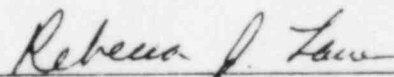
(Braidwood Nuclear Power)
Station, Units 1 and 2))

Docket Nos. 50-456
50-457

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CERTIFICATE OF SERVICE

I, Rebecca J. Lauer, one of the attorneys for Commonwealth Edison Company, certify that copies of the letter, dated July 3, 1985, from Joseph Gallo to the Administrative Judges, together with copies of the enclosure thereto, have been served in the above-captioned matter on those persons listed in the attached Service List by United States mail, postage prepaid, this 3rd day of July, 1985.


Rebecca J. Lauer

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DATED: July 3, 1985

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