



Commonwealth Edison

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DMS

May 3, 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.
50-456/85-007 and 50-457/85-007
NRC Docket Nos. 50-456 and 50-457

REFERENCES (a): R. F. Warnick letter to C. Reed
dated April 4, 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 February 13 through March 22, 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,

D. L. Farrar
Director of Nuclear Licensing

Enclosure

cc: NRC Resident Inspector - Braidwood

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ENCLOSURE

Response to
Inspection Report 456/85-007 and 457/85-007
Item 456/85-007-02 and 457/85-007-02
Item 456/85-007-08 and 457/85-007-08

Item of Noncompliance

10 CFR 50, Appendix B, Criterion V, states in part that activities affecting quality shall be prescribed by documented instructions procedures, or drawings, and shall be accomplished in accordance with these instructions, procedures, or drawings.

The Commonwealth Edison Quality Assurance Manual, Section Q.R. No. 5.0, Revision 7, Instructions, Procedures and Drawings, states in part, "Activities affecting quality are required to be prescribed by documented instructions, procedures or drawings."

Contrary to the above:

- a. The piping contractor did not have a procedure or documented instruction stipulating a systematic method for producing an accurate Inservice Inspection drawing, including determining the number and location of all field welds and shop welds.
- b. Support plates were installed between the concrete pedestal base and the anchor bolt hold down plate for the Unit 1 and 2 containment spray pumps, however, they were not specified on the drawings and therefore these plates, including the size, type, or grade of material, were not analyzed for design basis. Furthermore, these additional plates were not identified during quality control installation inspections.

Response - Part a

Commonwealth Edison Company (CECo) does not agree this activity is an example of noncompliance. We note the above reference to 10 CFR 50, Appendix B, Criterion V omits key wording applicable to this issue. 10 CFR 50, Appendix B, Criterion V states "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished".

Phillips, Getschow Company (PGCo) has in place the necessary general quality procedures and training programs to systematically control the production of accurate Inservice Inspection Drawings (IID). Essentially,

PGCo develops and reviews these IID drawings for Commonwealth Edison Production Department Technical Staff. The Technical Staff which has the assigned responsibility for performance of Pre-Service/In-Service Inspection activities, including the review of PSI Isometric Drawing's (PSIID's) for conformance with preservice conditions (Reference paragraph 4.4 of PCD-25). PGCo performs this activity under a CECO-PGCo Pre-Service Interface Agreement. There are no unique processes involved in this activity that require extra control be established at PGCo. The drawings prepared by PGCo do receive an independent PGCo engineering check using a simple checklist.

The controlling procedure under the Interface Agreement is Commonwealth Edison Company Braidwood Nuclear Station Project Procedure PCD-25, "Distribution and Control of Site PSI Drawings". This procedure already provides the necessary instruction and the direction to accurately and efficiently control the Inservice Inspection Drawings (IID). PGCo is issued a copy of PCD-25. Specifically, Paragraph 4.1 of the subject procedure states that "The PSI Isometric Drawings (PSIID) shall be prepared by Phillips, Getschow Company from Byron PSI Isometrics, Southwest Fabrication Isometrics, PGCo As-Construct Isometrics, actual walkdowns and guidance from Project Engineering/Sargent & Lundy". As stated above, the completed PSIID receive an PGCo "in-house" review to ensure that all attributes specified on the ISI checklist are included correctly on the PSIID.

We believe the incorrect spool identification referred to in Reference (a) was a transposition error and does not fully constitute a need for additional procedures and/or instructions. We believe the necessary documented instructions and procedures of a type appropriate to the circumstances were in place to systematically control preparation of accurate PSIIDs. We do not agree this activity is in noncompliance with Criterion V.

However, to reach resolution on this issue and better define the activities relating to the generation of PSIID's, CECO procedure PCD-25 will be revised to include the PGCo ISI drawing checklist currently used by PGCo. Further, PCD-25 will be reviewed to determine if any additional clarifications will facilitate this work. These activities will be completed by June 30, 1985.

Response to
Inspection Report 456/85-007 and 457/85-007
Item 456/85-007-02 and 457/85-007-02

Response - Part b

Commonwealth Edison agrees that a deficiency exists in the containment spray pump base installation.

Corrective Action Taken and Results Achieved

The piping contractor has initiated Nonconformance Report No. 3963 to document the apparent deficiency on the containment spray pump base installation. This report is currently being evaluated by Commonwealth Edison Company Project Field Engineering. The four residual heat removal pumps which are of the same design as the containment spray pumps were examined by the mechanical contractor and Commonwealth Edison Project Construction. Similar deficiencies were identified on each pump. The piping contractor initiated Nonconformance Report No. 3961 to document this deficiency. This report is currently being evaluated by Commonwealth Edison Company Project Field Engineering.

Commonwealth Edison Company NCR 6083 provides for reviews of other safety-related equipment pump bases and supporting documentation to ensure correct installation, grouting and inspection. Any further similar deficiencies will be appropriately documented and dispositioned.

Corrective Action Taken to Avoid Further Noncompliance

Phillips, Getschow Company Equipment Installation Procedure, QCP B22, Rev. 5 and subsequent revisions contain adequate controls since implementation of that procedure revision to preclude similar deficiencies on equipment installations. Additionally, improved G.K. Newberg equipment grouting control instituted in the past year will preclude similar grouting deficiencies on equipment installations. We believe no further preventative corrective actions are required by Commonwealth Edison and Contractors.

Date of Full Compliance

Corrective actions will be determined by Project Field Engineering's disposition of Nonconformance Report Nos. 3961 and 3963. A supplemental response will be submitted regarding this disposition and appropriate corrective actions. The corrective actions associated with NCR 6083 will be completed commensurate with System Release to Operations activities.