

RELATED CORRESPONDENCE

July 30, 1985
Revised August 1, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND
LICENSING BOARD

DOCKETED
USNRC

'85 AUG -5 A11:31

In the Matter of:
Commonwealth Edison Company

(Braidwood Nuclear Power
Station, Units 1 and 2)

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Docket Nos. 50-456
50-457

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Applicant's First Partial Response to
Rorem's First Set of Quality Assurance
Interrogatories and Requests to Produce

On July 2, 1985, Intervenor Rorem, et al., ("Intervenors") filed their First Set of Quality Assurance Interrogatories and Requests to Produce. On July 30, 1985, Commonwealth Edison Company ("Applicant") filed objections to certain of those discovery requests. This submission is Applicant's first partial response to Intervenor's discovery requests. Investigation continues for responses to all of the requests to which Applicant has not objected.

Each document identified in Applicant's response or incorporated by reference into Applicant's response has been identified with a number. In addition, Applicant has provided indices for these documents organized by interrogatory number, which identify for each numbered document the date, author, recipient, and type of document. The indices will be updated with each partial response submitted by Applicant.

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Documents which are incorporated by reference to answer interrogatories are being provided to all parties. Documents which are simply identified in answers to interrogatories, but not incorporated by reference, are available for inspection and copying. Documents for which Applicant is asserting privilege have not been provided, and an indication can be found on the indices as to whether the attorney client ("AC") or attorney work product ("WP") privilege is being asserted.

With regard to requests for addresses and telephone numbers of individuals employed by Commonwealth Edison or its contractors, onsite personnel can be located by contacting Braidwood Nuclear Power Station, Braceville, Illinois 60407 (phone 815-458-2801). Other Commonwealth Edison personnel can be located by contacting 72 W. Adams St., P.O. Box 767, Chicago, Illinois 60690 (phone 312-294-4321). Applicant is making a further review of individuals identified in response to specific interrogatories and will supplement its answers to the extent that such individuals now have other addresses or telephone numbers.

SPECIFIC INTERROGATORY 9

Please identify each deficiency in design and construction as defined in 10 CFR Section 50.55(e) and for each indicate the classification of its significance (i.e., classified under which subsections, 50.55(e) (i) (i-iv); the 10 CFR Part 50 Appendix A, General Design Criteria to which each relates and the respects in which it reflects noncompliance, the report number, and date, if any; the names, titles, addresses, and telephone numbers of each person responsible for the deficiency, its discovery, its reporting, and its corrective action; a detailed description of the deficiency and its safety implications, a detailed description of its correction action.

RESPONSE

The NRC identified certain deficiencies referenced in the Contentions in Inspection Report(s) 82-05, 83-09, and 84-17. Applicant classified these same deficiencies as reportable under 10 C.F.R. 50.55(e). Section 50.55(e) Reports 82-07, 83-07, and 84-10 which Applicant is providing in response to the Interrogatory set forth most of the information requested. Applicant is unable to relate the deficiencies reported to the General Design Criteria of 10 C.F.R. Part 50, Appendix A since these deficiencies were not design deficiencies. Applicant does not use a system of classification of reportable deficiencies which corresponds one to one with the subcategories of 50.55(e) (1). Applicant reported 50.55(e) Report No. 82-07 in response to a specific item of noncompliance in NRC Inspection Report No. 82-05 without specifically classifying the deficiency under 50-55(e)(1). In the case of 50.55(e) Report No. 83-07, Applicant reported the deficiency only as potentially reportable under 50.55(e) and has to date made no significance determination. For 50.55(e) Report No. 84-10, the deficiency falls under subcategory (iii). In addition, Applicant is unable to identify any specific individuals who were responsible for the specified deficiencies.

SPECIFIC INTERROGATORY 12

Describe in detail each review of the Braidwood Quality Assurance Program by the NRC Staff. For each, please indicate the deficiencies found, the adjustments, modifications and improvements resulting or otherwise made; the Commonwealth Edison position and response; the names, titles, addresses and telephone numbers of each person involved and a description of the involvement of each.

RESPONSE

The Preliminary Safety Analysis Report ("PSAR"), the Final Safety Analysis Report ("FSAR"), and the Safety Evaluation Report ("SER") define the Braidwood Quality Assurance Program as the Commonwealth Edison Company Topical Report. Revision 0 of the Topical Report and the current Revision are provided. In addition, Applicant has provided the applicable portions of licensing documents and the NRC reviews of and Commonwealth Edison's revisions to the Topical Report. These documents describe the reviews of the Braidwood Quality Assurance Program by the NRC and indicate any resulting deficiency findings, adjustments, modifications, or improvements, as well as Commonwealth Edison's position and responses. Commonwealth Edison personnel involved in the drafting and revision of these documents are identified in the correspondence by either name and/or title.

SPECIFIC INTERROGATORY 13

Please describe in detail the selection, training, testing and evaluation program for Quality Assurance personnel and Quality Control Inspectors for Edison and for each contractor responsible for any safety related construction at Braidwood from the commencement of construction until the present.

RESPONSE

Section 4 of Intervenor's QA contention refers to the training for Comstock weld inspectors and G.K. Newberg QC inspectors. Applicant is providing copies of the training programs for Comstock weld inspectors and Newberg QC inspectors at Braidwood from the start of construction to the present.

In light of the joint stipulation admitting section 2.c of the QA contention, Applicant will provide a response concerning the training, testing, and evaluation programs for the Comstock QC inspectors at a later date.

SPECIFIC INTERROGATORY 18

With respect to each NRC Staff inspection report regarding quality assurance at Braidwood, please identify, and make available for inspection and copying, all correspondence by and between the NRC Staff and Commonwealth Edison or its contractors regarding such inspection and any corrective action.

RESPONSE

Correspondence between the NRC Staff and Applicant or between the NRC Staff and Applicant's contractors relating to Staff inspection reports is identified in the index for specific interrogatory number 18. These documents are available for inspection and copying.

SPECIFIC INTERROGATORY 25

Subsequent to these NRC findings, did Pullman institute a stop work order involving HVAC work? If so, please describe in detail and explain why this problem occurred. Describe in detail any corrective action taken. Please identify any documents which reflect these answers.

RESPONSE

Pullman instituted a stop work order involving HVAC work in 1983 when the NRC Staff's concerns which were later set forth in Inspection Report 83-09 were made known to employees of Applicant and Pullman as reflected in NRC Inspection Report 83-09 (page A0001501). This stop work order was issued for all safety related HVAC welding on August 3, 1983. The specific issues are described in Inspection Report findings 83-09-10 (A)-(C). (See esp. pages A0001500-A0001501). Applicant's explanations concerning and responses to the NRC's findings can be found in its correspondence with the NRC concerning Inspection Report 83-09. (See pages A0001529-A0001536, A0001573-A0001574, A0001579-A0001581, A0001654-A0001659, A0001662-A0001666).

Actions which were taken to resolve the concerns which led to the stop work are described in the memoranda which are included at pages M0000250-M0000281.

These documents also reflect the conditions under which the stop work order was lifted. The approval of Revision 4 to Installation Procedure B9.4.F included the adoption of the weld process sheet which was crucial to the lifting of the stop work order. (See pages M0000035-M0000051). Further information on the Installation Procedure and the weld process sheet is provided in response to specific interrogatory number 39.

SPECIFIC INTERROGATORY 29

Subsequent to these NRC findings, did Pullman fail to institute corrective action to establish compliance with AWS D1.1 inspection requirements? If so, please describe in detail the circumstances and explain why this problem occurred and corrective action taken. Please identify any documents which reflect these answers.

RESPONSE

Applicant believes that this question relates to item 12.B.3 of the QA contention. This item of the contention is drawn from Inspection Report finding 83-09-07(B) found at page number A0001505 of the documents being provided. Item of noncompliance 1.c. of Inspection Report 83-09 (page number A0001444) corresponds to this issue and concerns the corrective action for Pullman Nonconformance Report BR-08. The NRC did not find that Pullman failed to institute corrective action for NCR BR-08, but rather identified a concern relative to the adequacy of the corrective action. As asserted in its response to noncompliance 1.c., Applicant believes the corrective action for NCR BR-08 was adequate. (See pages A0001516-A0001517, A0001658, A0001665-A0001666).

SPECIFIC INTERROGATORY 39

What traveler package control system for identifying welding procedures and material consumed for HVAC components has been implemented at Braidwood? Is such a system an industry-wide standard practice? Has the NRC ever identified any deficiencies in the Braidwood HVAC program with regard to such a system? If so, please describe in detail. Please identify any documents which reflect such a system, such deficiencies any any response or corrective action.

RESPONSE

Pullman Sheet Metal has a system for identifying welding procedures and materials for HVAC field welding. This system is embodied in a Process Sheet which is identified in Installation Procedure B9.4.F. (See pages - M0000001 - M0000249). The Process Sheet, which travels from the weld engineer to Quality Assurance, is logged and stamped "Controlled." Then the Process Sheet goes to the production field personnel. QC inspection is performed as appropriate and documented on the applicable inspection form. The Process Sheet is forwarded to QC for inclusion in the applicable inspection record package. Applicant understands the Process Sheet to fall within the ordinary meaning of the term "traveler package control system."

Applicant knows that a "traveler package control system" for identifying welding procedures and material consumed for HVAC components was used at the Byron Nuclear Power Station. Applicant does not know specifically how the Process Sheet system compares to other traveler systems in use in the industry.

Section 3.A. of the QA contention makes reference to an item of noncompliance documented by the NRC relating not to the traveler system, but rather to the adequacy of instructions on weld "travelers". Applicant interprets Intervenor's question as relating to this finding. The NRC's concern is documented in Inspection Report finding 83-09-10(A) (page A0001500) and is classified as noncompliance 3.a in the accompanying Notice of Violation. (pages A0001446-A0001447). Documents which reflect the Process Sheet system, the NRC's findings, and Applicant's response or corrective action are identified in the enclosed index of documents responsive to interrogatory 39.

SPECIFIC INTERROGATORY 47

Has the NRC ever found that in the area of HVAC the lack of specific weld procedures to be used by craft has allowed craft to select the procedure and technique to be used, resulting in HVAC welding activities of indeterminate quality? If so, please describe in detail the circumstances and explain why these problems occurred and what corrective action has been taken. Set forth any facts which demonstrate that such corrective action has been effective. Please identify any documents which reflect these answers.

RESPONSE

The answer to the initial question contained in this interrogatory is no. However, Applicant believes that this Interrogatory seeks information concerning Inspection Report finding 83-09-10(A). (See page number A0001500). In that finding the NRC did not find a lack of specific weld procedures in the area of HVAC, but rather found that, while there were weld procedures, the instructions on "travelers" or other such documentation did not identify for the craftsmen which weld procedure to use for a specific installation. The result was that the craftsmen selected the weld procedure to be used for a specific installation. An explanation of the NRC's findings can be found in Inspection Report 83-09. A detailed description of Applicant's position on this issue and corrective actions taken can be found in the response to 83-09, Item 3.a. (See page numbers A0001447, A0001500, A0001529-A0001532, A00001579-A0001580, A0001659).

The findings of Commonwealth Edison's QA surveillance 3180 demonstrate the effectiveness of Applicant's corrective action. (See pages B0000660-B0000661). The manner in which the stop work order referenced in answer to interrogatory 25 was released gives additional confidence that the corrective actions were effective. Work activities were resumed in stages and were initially subject to a 100% surveillance by Pullman QC Inspectors. (See pages H0000250-H0000281, A0001532-A0001533 for a full description of this matter). In addition, an investigation of weld filler metal has demonstrated that adequate weld filler metal had been used (see pages A0001579-A0001580). A program is also underway to test a number of randomly selected items which will be cut from the HVAC installations for the purpose of confirming HVAC weld adequacy.

SPECIFIC INTERROGATORY 48

Has the NRC ever found that a lack of Quality Control inspections required by AWS D1.1 prior to and during HVAC welding operations has resulted in HVAC structural welding of indeterminate quality? If so, please describe the circumstances in detail and explain why these problems occurred and what corrective action has been taken. Set forth any facts which demonstrate that such corrective action has been effective. Please identify any documents which reflect these answers.

RESPONSE

In Inspection Report 83-09, Items of Noncompliance 3.L and 3.c, the NRC found a lack of records documenting conformance with the requirements of AWS D1.1-1977. The NRC did not make a finding of indeterminate quality. (See page number A0001447 and A0001500-A0001501). Applicant's position on this issue, as well as corrective action taken, are identified in its response to Inspection Report 83-09 at pages A0001533-A0001536, A0001574, A0001581, A0001654-A0001661, A0001662-A0001664. Corrective action is effective because the applicable welding procedure has been revised to incorporate the specific AWS D1.1 attributes referred to in the Inspection Report.

The findings of Commonwealth Edison's QA surveillance 3180 demonstrate the effectiveness of Applicant's corrective action. (See pages B0000660-B0000661). The manner in which the stop work order referenced in answer to interrogatory 25 was released gives additional confidence that the corrective actions were effective. Work activities were resumed in stages and were initially subject to a 100% surveillance by Pullman QC inspectors (see pages M0000250-M0000281, A0001532-A0001533 for a full description of this matter). In addition, an investigation of weld filler metal has demonstrated that adequate weld filler metal had been used (see pages A0001579-A0001580). A program is also underway to test a number of randomly selected items which will be cut from the HVAC installations for the purpose of confirming HVAC weld adequacy.

Affidavit of Perry L. Barnes

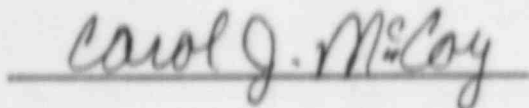
I, Perry L. Barnes, being first duly sworn, depose and state as follows:

- 1) I am employed by Commonwealth Edison Company as a licensing engineer at the Braidwood Nuclear Power Station.
- 2) My business address is Braidwood Nuclear Power Station, Braceville, Illinois 60407.
- 3) To the best of my knowledge and belief, the statements contained in the answers to Specific Interrogatories 9, 12, 13, 18, 25, 29, 39, 47, and 48 of Applicant's First Partial Response to Korem's First Set of Quality Assurance Interrogatories and Requests to Produce as revised on August 1, 1985 are true and correct. In some respects, these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees, consultants and contractors. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Further affiant says not.


Perry L. Barnes

Signed and sworn to before me
this 1st day of August 1985



August 1, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:
COMMONWEALTH EDISON COMPANY

(Braidwood Nuclear Power
Station, Units 1 and 2)

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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 August 1, 1985, from Rebecca J. Lauer to Douglass Cassel, the August 1, 1985 revised version of Applicant's First Partial Response to Rorem's First Set of Quality Assurance Interrogatories and Requests to Produce, and the Affidavit of Perry L. Barnes have been served in the above-captioned matter on those persons listed in the attached Service List by United States mail, postage prepaid, this 1st day of August, 1985.

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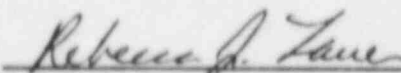
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Dated: August 1, 1985