

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'85 DEC -6 P12:27

In the Matter of)
COMMONWEALTH EDISON COMPANY)
(Braidwood Station, Units 1 and 2))

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket Nos. 50-456
50-457

NRC STAFF SECOND RESPONSE TO
INTERVENOR'S SECOND SET OF INTERROGATORIES

SPECIFIC INTERROGATORY

1. For each subpart, or item, of the contention (including the Quality Control (QC) Inspector Harassment Contention), please describe in detail any actions, programs or factor upon which you rely to show that the matter asserted in the contention does not evidence a significant breakdown in quality assurance or a failure of safety-related parts, components, or systems to meet applicable regulatory requirements or to be capable of performing their intended function in service. Please identify any documents which reflect this answer.

ANSWER:

The vast majority of the items comprising Intervenor's Amended Quality Assurance Contention are taken directly from the Notices of Violation issued in connection with the Region III inspection reports. The Applicant's response to each of the Notices of Violation describes the actions taken to correct the problem and to preclude its recurrence. The Applicant has also submitted 10 C.F.R. § 50.55(e) reports concerning several of the items described in the Notices of Violation which further describe corrective actions being taken by the Applicant.

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In addition to its regular inspection program, the Staff is monitoring extensively Applicant's adherence to the commitments made in its responses to the Notices of Violation and in its 10 C.F.R. § 50.55(e) reports. The Staff will rely on its routine inspection program plus its inspections of the Applicant's corrective actions in determining whether there is reasonable assurance that no pervasive breakdown in the Applicant's QA/QC program has occurred, and that all safety related parts, components, and systems meet regulatory requirements and will perform their intended function in service.

Subpart 1F - This contention is based upon a statement on Page A-4, Appendix A, Executive Summary of the NRC CAT Reports No. 50-456/84-44; No. 50-457/84-40 (IR 84-44/40). Since the concern was not identified in the Overall Conclusions of Appendix A or in the Potential Enforcement Actions of Appendix B of the same report, the Applicant was not required to respond to this concern. Although there is no specific regulatory requirement for trending programs, it is a commonly accepted method used to assist in the identification of trends that might result in significant problems. In order to determine whether the concerns identified by the CAT team are identified are indicative of a significant breakdown in quality assurance, the Staff will rely upon inspections performed during the past several years. These inspections did not uncover any significant deficiency which could be attributed to the concerns identified in the CAT report. In addition, the Staff is currently evaluating the contractor trending programs.

Subpart 2C - This part of the contention deals with allegations from several individuals concerning possible harassment and intimidation of L. K. Comstock (LKC) electrical QC inspectors. See August 8, 1985 Response to Interrogatory 55 for a summary of each of these allegations. The Staff will rely on its investigations of these allegations to resolve the matters raised in subpart 2c. The actions taken by the Staff to date are summarized below:

Allegation RIII-84-A-0119: As stated in the Staff response to Interrogatory 55, this allegation was closed in Inspection Report No. 50-456/84-34; 50-457/84-32. The alleged was furnished with a copy of this report on January 21, 1985. The alleged did not then and has not since indicated any dissatisfaction with the Staff's resolution of his complaint. On September 11, 1985, Region III received certain information from the U. S. Department of Labor relating to certain statements purportedly made by the alleged which, in the Staff's view, warranted a reopening of this allegation. On September 13, 1985, the Staff requested additional information from the alleged. As of this writing, however, the alleged has not responded to that request.

Allegation R-III-84-0123: No change from response to Interrogatory 55.

Allegation RIII-85-05: This allegation was partially closed in Inspection Report No. 50-456/85044; 50-457/85043. Interviews with QC

inspectors did not reveal any instances of harassment or intimidation resulting in inadequate performance of inspections. Additional inspections have been conducted concerning the basemetal inspection portion of the allegation. That portion of the allegation will be closed in a future inspection report.

Allegation RIII-85-0067: This allegation was omitted inadvertently from the Staff's response to Interrogatory 55. This allegation was raised by an LKC QC inspector and has three parts: (1) QC inspector reprimanded for alleged failure to meet production quotas; (2) QC inspectors improperly trained in conduit specifications; and (3) L.K. Comstock's double flare bevel groove weld procedure was used by welders before it had been properly qualified.

As discussed in Inspection Report 50-456/85021; 50-457/85022, regional inspectors could not substantiate parts (1) or (2) of this allegation. Part (3) of the allegation involving welding will be addressed in a future inspection report.

Allegation RIII-85-A-0068: This allegation was closed by Region III inspectors in Inspection Report No. 50-456/85021; 50-457/85022. No instance of harassment and intimidation resulting in procedural violations or the acceptance by LKC inspectors of discrepant work was identified.

Allegation RIII-85-A-0072: This allegation, which consists of 17 parts or concerns, was closed in Inspection Report 50-456/85021; 50-457/85022. The report substantiated the claim that one L.K. Comstock supervisor had engaged in intimidating conduct. This supervisor was terminated by L.K. Comstock as a result of an investigation conducted by the Applicant after the alлегers came to the NRC. The staff's investigation did not reveal any instances in which the QC inspectors did not perform their inspections properly as a result of the alleged harassment and intimidation.

Subpart 3A - See NRC Staff First Response to Intervenor's Second Set of Interrogatories, Specific Interrogatory 1, response to subpart 1B for the requested information.

Subpart 3B - This part of the contention concerns a violation identified in NRC Inspection Report No. 50-456/85015; No. 50-457/85016. The violation (Region III Tracking Items No. 50-456/85015-01; No. 457/85016-01) was identified by Region III Inspector R. Schulz. The Applicant's response to this violation is documented in CECO's letter to NRC dated June 21, 1985 from D. L. Farrar to J. G. Keppler. The violation involved uncontrolled cutting of holes in webs of safety-related beams. The Staff will rely on its inspections of the corrective actions committed to by the Applicant in the above referenced response. Region III Inspectors R. Schulz and J. Muffett are conducting the inspections to resolve this issue.

Subpart 3C - This subpart concerns a violation identified in NRC Inspection Report No. 50-456/85006; No. 50-457/85007. This violation (Region III Tracking Items No. 50-456/85-06-02; No. 50-457/85-06-02) was identified by Region III Inspector R. Gardner. The Applicant's response to this violation is documented in CEC's letter dated May 6, 1985 from D. L. Farrar to J. G. Keppler. In its response the Applicant disagreed that this is a valid violation of regulatory requirements. Applicant agreed, however, to take action to strengthen its program. The Staff is satisfied with the Applicant's action to strengthen their program. This will be confirmed in a future inspection report.

Subpart 4A - This subpart is derived from a violation consisting of three examples or parts identified in NRC Inspection Report No. 50-456/84-07; No. 50-457/84-07. The item at issue was identified by NRC Inspector W. Kropp who is also responsible for its review and closure. The Applicant's response to this violation is documented in CEC's letter to the NRC dated August 20, 1984 from D. L. Farrar to J. G. Keppler.

The first part of this violation (Region III Tracking Items No. 456/84-07-02(a); No. 457/84-07-02(a)) was closed in Inspection Report No. 50-456/84-42; No. 50-457/84-38. This inspection verified the Applicant's corrective actions described in their response referenced above. The inconsistencies upon which this violation was based is not indicative of a significant breakdown in Applicant's quality assurance program.

The second part of this violation (Region III Tracking Items No. 456/84-07-026; No. 457/84-07-026) was closed in Inspection Report No. 50-456/85-32; No. 50-457/85-31, as was the third part (Region III Tracking Items No. 456/84-07-02c; No. 457/84-07-02c). The concerns upon which these two parts of the violation were based are not indicative of a significant breakdown in quality assurance.

Subpart 4B - This part of the contention also is derived from Inspection Report 84-07. The Applicant's response is also referenced under subpart 4A. This problem (Region III Tracking Items No. 456/84-07-04; No. 457/84-07-04) was identified by and will be resolved by NRC Inspector W. Kropp.

Subpart 5A - This part of the contention is derived from a statement made on Page A-3 of the CAT Inspection Report (No. 50-45684-44; No. 50-457/84-40). The CAT Team did not regard this problem significant enough to highlight it under those items requiring additional management attention in the Overall Conclusion, (Appendix A), or to include it under the Potential Enforcement Findings, (Appendix B). Therefore, Applicant was not required to respond to this concern. Apparently, the CAT Team considered Applicant's commitment to modify S&L Braidwood Field Instruction (BRFI) 4 adequate to resolve this problem. (See Page VII-12 of the CAT report Details). Region III will confirm that this field instruction was modified. The Staff does not believe that this one instance identified by CAT evidences a significant breakdown in quality assurance.

Subpart 5B - This subpart is derived from NRC Inspection Report 85-15. This violation (Region III Tracking Items No. 456/85015-07; No. 457/85016-06) was identified and will be closed by NRC Inspector W. Kropp. The Applicant's corrective actions are described on Page 16 of Inspection Report 85-15.

Subpart 5C. - This part of the contention concerns a violation identified in Inspection Report No. 50-456/84-43; 50-457/84-39. The Applicant's response to the violation, including corrective action, is documented in CECO's letter to the NRC dated April 15, 1985 from D. L. Farrar, Director of Nuclear Licensing, to J. G. Keppler, Regional Administrator. Inspector Miffett identified this violation and is also responsible for its resolution and closure. The NRC inspections of the corrective actions have been completed, and an inspection report will be issued soon.

Subpart 6B - This subpart relates to Violation 2.a. through 2.e. identified in NRC Inspection Report 83-09. The Applicant's responses describing their corrective actions are documented in the Staff's interrogatory response relating to subpart 1B.

Violation 2.a. was assigned Region III Tracking Items No. 456/83-09-02(A); No. 457/83-09-02(A) and was identified by R. Schulz who also has the responsibility for review and closeout. Inspection of this item is in progress. A followup inspection is documented in Inspection Report No. 50-456/85032; No. 50-457/85031.

Violation 2.b. was assigned Region III Tracking Items No. 456/83-09-02(B); No. 457/83-09-02(B). NRC Inspector J. Muffett will be responsible for review and closure of this item. This violation involved the failure to make piping wall thickness measurements during receipt inspection. A supplemental response to this violation was submitted by the Applicant's letter dated September 25, 1985 from L. O. DelGeorge to J. G. Keppler. This letter also references the 30 day and supplemental reports submitted on this subject as 10 C.F.R. § 50.55(e) No. 84-10. All of these documents describe corrective actions that the Staff will inspect to resolve this issue.

Violation 2.c. was assigned Region III Tracking Items No. 456/83-09-02(C); No. 457/83-09-02(C). R. Schulz identified this violation and is responsible for review and closure.

Violation 2.d. was assigned Region III Tracking Items No. 456/83-09-02(D); No. 457/83-09-02(D). R. Schulz identified this violation and documented his review and closure of the item in Inspection Reports No. 50-456/85032; No. 50-457/85031. The Staff's inspection of this item did not produce any evidence which would suggest that a significant breakdown in quality assurance had occurred.

Violation 2.e. was assigned Region III tracking Items No. 456/83-09-02(E); No. 457/83-09-02(E). R. Schulz identified this violation and P. Pelke reviewed and closed out this item in Inspection Report No. 50-456/85051; No. 50-457/85049. The Staff's inspections of this item do not indicate

a significant breakdown in Applicant's quality assurance program has occurred.

Subpart 6C - This subpart concerns a violation noted in Inspection Report No. 50-546/85-07; No. 50-457/85-07. The Applicant's corrective action is documented in its response dated May 3, 1985 from D. L. Farrar to J. G. Keppler. The violation (Region III Tracking Items No. 456/85-07-08; No. 457/85-07-08) was identified by R. Schulz who also is responsible for review and closeout. A followup inspection was documented in Inspection Report No. 50-456/85032; No. 50-457/85031 (IR 85-32/31). Inspection of this concern is in progress.

Subpart 6D - This subpart is a violation identified in the NRC inspection report referenced under subpart 6C above. The Applicant's response is also referenced above. In addition the Applicant documented a supplemental response in the CEC letter dated September 9, 1985 from A. D. Miosi, Nuclear Licensing Administrator to J. G. Keppler, Regional Administrator. R. Schulz identified this problem and is responsible for review and closeout. It is assigned Region III tracking Items No. 456/85-007-02; No. 457/85-007-02.

Subpart 6E - This subpart concerns a violation noted in Inspection Report No. 50-546/84-31; No. 50-547/84-29. The Applicant's corrective action is documented in its letter to NRC dated December 21, 1984 from D. L. Farrar to J. G. Keppler. This item (Region III tracking Item No. 457/84-29-02) was reviewed and closed by NRC Inspector R. Schulz in Inspection Report

No. 50-456/85007; No. 50-457/85007. This violation did not evidence a significant breakdown in quality assurance.

Subpart 6F - This subpart concerns a violation noted in NRC Inspection Report No. 50-456/84-21; No. 50-457/84-20. The Applicant's corrective action is documented in its letter to the NRC dated January 31, 1985 from D. L. Farrar to J. G. Keppler. This violation (Region III Tracking Items No. 456/84-21-03; No. 457/84-20-03) was identified by NRC Inspector R. Schulz. Inspector Schulz reviewed the corrective actions and closed this issue in Inspection Report No. 50-456/85-07; No. 50-457/85-07. This violation did not evidence a significant breakdown in quality assurance.

Subpart 6G - This subpart is a violation identified in Inspection Report No. 50-456/84-17; No. 50-457/84-17 (IR 84-17). The Applicant's corrective action is documented by CECO's letter dated November 28, 1984 from D. L. Farrar to J. G. Keppler. Inspector R. Schulz identified this item (Region III Tracking Items No. 456/84-17-01; No. 457/84-17-01) and closed it in Inspection Report No. 50-456/84-42; No. 50-457/84-38. The effect that chemical cleaning of the corroded pipe had on the pipe wall thickness is being addressed by the corrective actions documented in the Applicant's 10 C.F.R. § 50.55(e) Report No. 84-10 submitted to the NRC on July 20, 1984.

Interim reports on the above § 50.55(e) report were submitted to the NRC on September 18, 1984; November 2, 1984; December 12, 1984; February 27, 1985; and May 2, 1985. The final report is being prepared by the

Applicant. Inspector J. Muffett is responsible for review and closeout of this report.

Subpart 6H - This subpart is a violation identified in Inspection Report No. 50-456/84-09; No. 50-457/84-09 (IR 84-09). The Applicant's corrective action is described in CEC's letter from D. L. Farrar to J. G. Keppler dated July 31, 1984; October 22, 1984; November 7, 1984; and February 13, 1985. This item (Region III Tracking Items No. 456/84-09-01; No. 457/84-09-01) was identified by R. Schulz and review and followup responsibility has been assigned to J. Muffett.

Subpart 6I - This subpart is a violation identified in IR 84-09 by R. Schulz. The Applicant's responses are referenced under subpart 6H. Mr. Schulz reviewed and closed this item (Region III Tracking Items No. 456/84009-05; No. 457/84009-05) in Inspection Report No. 457/85-16. The event did not evidence a significant breakdown in quality assurance.

Subpart 7A - This subpart is a violation identified in IR 83-09 by R. Schulz. This issue (Region III Tracking Items No. 456/83-09-01; No. 457/83-09-01) is part of the small bore piping issues addressed in the Applicant's responses referenced under Subpart 1B of the Staff's First Response to Intervenor's Second Set of Interrogatories. Inspector J. Muffett is assigned review and closeout responsibilities for this item.

Subpart 8B - This subpart is a violation identified in IR 84-44/40. This item (Region III Tracking Items No. 456/84-44-03; No. 457/84-44-03) was identified by CAT and became a violation in the Notice of Violation (NOV) documented in NRC's letter dated April 11, 1985 to CECo from C. E. Norelius to Cordell Reed. The Applicant's corrective action is documented in its letter to NRC dated May 16, 1985 from D. L. Farrar to J. G. Keppler. Inspector R. Mendez is responsible for the review and closure of this item.

Subpart 8C - This is a violation identified in IR 84-44-40. This item (Region III Tracking Items No. 456/84-44-04; No. 457/84-40-04) was identified by CAT and became a violation in the NOV referenced under Subpart 8B. The Applicant's corrective action is referenced under Subpart 8B. Inspector W. Kropp is assigned to review and followup this item. A followup inspection is documented in IR 85-32-31.

Subpart 8D, 8E, 8F - This is a violation consisting of three examples identified in Inspection Reports No. 50-456/85-08; No. 50-457/85-08. The Applicant's corrective action is documented in CECo's letter to NRC dated May 15, 1985 from D. L. Farrar to J. G. Keppler. Inspector D. Williams identified and is responsible for review and closure of this item (Region III Tracking Items No. 456/85-08, 10a, -10b and -10c). Inspection of these items is in progress.

Subpart 9A - This subpart is a violation with two examples identified in Inspection Report No. 50-456/84-21; No. 50-4576/84-20 (IR 84-21/21).

The Applicant's corrective action is documented in CEC's letter to the NRC dated January 31, 1985 from D. L. Farrar to J. G. Keppler. These items (Region III Tracking Items No. 456/84-21-01; No. 457/84-20-01; No. 456/84-21-02; No. 457/84-20-02) have been assigned to NRC Inspector J. Jacobson for review and closure. Item No. 456/84-21-01; No. 457/84-20-01 was closed out in Inspection Report No. 50-456/85040; No. 50-457/85039. This item did not evidence a significant breakdown in quality assurance. The second item is not ready for closure.

Subpart 9B - This subpart is a violation identified in IR 84-21/20 The Applicant's corrective action is documented under Subpart 9A. Inspector J. Muffett has been assigned responsibility for review and closure of this item (Region III Tracking Items No. 456/84-21-08; No. 457/84-20-08).

Subpart 9C - This subpart is a violation identified in Inspection Report No. 50-456/84-13; No. 50-457/84-13 by R. Schulz. The Applicant's corrective action is described in CEC's letter to NRC dated September 21, 1984 from D. L. Farrar to J. G. Keppler. Inspector K. Ward reviewed and closed out this violation in Inspection Report No. 50-456/85-05; No. 50-457/85-05. This violation did not evidence a significant breakdown in quality assurance and did not result in deficient welds.

Subpart 9D - This subpart is a violation consisting of two examples identified in IR 84-17. The corrective action is documented in IR 84-17 and no response was required. Inspector K. Ward closed these items in Inspection Report No. 50-456/84-40; No. 50-457/84-37 (Region III

tracking Items No. 456/84-17-06; No. 457/84-17-06; No. 456/84-17-08; No. 457/84-17-08). These violations did not evidence a significant breakdown in quality assurance, or in a component being incapable of performing its intended purpose.

Subpart 9E - This subpart is a violation identified in Inspection Report No. 50-456/84-08; No. 50-457/84-08. The Applicant's corrective action is documented in CEC's letter to the NRC dated June 21, 1984 from D. L. Farrar to J. G. Keppler. Inspector K. Ward reviewed and closed this violation in Inspection Report No. 50-456/85-05; No. 50-457/85-05. The Staff's inspection did not reveal evidence of a significant breakdown in quality assurance. The lack of a specific requirement documenting weld fit-up verification did not appear to have resulted in unacceptable welds.

Subpart 10B - The subpart is an unresolved item (Region III tracking Items No. 456/83-09-04(a); No. 457/83-09-04(A) and No. 456/83-09-04(B); No. 457/83-09-04(B)) identified in IR 83-09. This part of the contention consists mainly of quotations from the NRC letter transmitting IR 83-09 to the Applicant. All of the related documentation is referenced in the response to Specific Interrogatory 1, Subpart 1B, NRC Staff First Response to Intervenor's Second Set of Interrogatories. This unresolved item was identified by NRC Inspector R. Schulz. NRC Inspector J. Muffett is responsible for review and closure. To resolve this issue the Applicant committed to carry out the Material Traceability Verification Program (MTVP). The final report of the MTVP has been issued and was transmitted

to the Staff by letter dated November 20, 1985 from L. O. DelGeorge to J. G. Keppler. Staff followup inspection of the MTVP are documented in Inspection Reports No. 50-456/85-09; No. 50-457/84-09; No. 50-456/84-21; No. 50-457/84-20; No. 50-456/84-31; No. 50-457/84-29; No. 50-456/84-34; No. 50-457/84-32; No. 50-456/84-42; No. 50-457/84-38; No. 50-456/85007; No. 50-457/85007; No. 50-456/8515; No. 50-457/85016; No. 50-456/85043; No. 50-457/85042. The Staff's inspections to date have not revealed any design or safety significant deficiencies occurring as a result of the concerns identified in IR 83-09. The final Staff review is in progress and an inspection report will be issued.

Subparts 10C, 10D, and 10E - This contention is a violation consisting of three parts identified in the CAT (IR 84-44). The Applicant's corrective action is documented in the letter referenced in subpart 8B.

Subpart 10C (Region III Tracking Items No. 456/84-44-05; No. 457/84-40-05) has been assigned to Inspector P. Kaufman for review and closure.

Subpart 10D (Region III Tracking Items No. 456/84-44-06; No. 457/84-40-06) is the same as Subpart 1D. See the NRC Staff First Response to Intervenor's Second Set of Interrogatories for the response to subpart 1D.

Subpart 10E (Region III Tracking Items No. 456/84-4407; No. 457/84-40-07) has been assigned to P. Kaufman for review and closeout.

Subpart 10F - This subpart is a violation identified in IR 85-15/16. The Applicant's corrective action is documented in the June 21, 1985 letter referenced under subpart 3B. Inspector W. Kropp closed this

item (Region III Tracking Item No. 456/85018-18) in Inspection Report No. 85-32/31. This violation appeared to be an isolated incident which did not evidence a significant breakdown in quality assurance.

Subpart 11B - This contention is a violation identified in Inspection Report No. 50-456/84-39; No. 50-457/84-36. Inspector P. Pelke identified this item (Region III Tracking Item No. 457/84-36-01) and is responsible for its review and closure. The Applicant was not required to respond to the violation as the inspector was satisfied with the corrective action taken prior to the completion of the inspection. Additional followup by the Staff in this area will be conducted when NRC Bulletin 82-04 is closed for Braidwood Unit 2.

Subpart 11C - This contention is a violation identified in Inspection Report No. 84-17. The licensee's corrective actions are included in the documents referenced under subpart 6G. The violation (Region III Tracking Item No. 456/84-17-02; No. 457/84-27-02) and has been assigned to J. Muffett for review and closeout.

Subpart 11D - This contention is a violation identified in Inspection Report No. 84-07 by Inspector W. Kropp (Region III Tracking Items No. 456/84-07-05; No. 457/84-07-05). Mr. Kropp is responsible for review and closeout of the Applicant's corrective actions documented in CECO's letter dated August 20, 1984 referenced under subpart 4A. This violation was closed in Inspection Report No. 85-32/31, and did not evidence a significant breakdown in quality assurance.

Subpart 12B - This contention is Violation 1.a., 1.b., and 1.c. identified in the Inspection Report No. 83-09 Notice of Violation. NRC Inspector R. Schulz identified this violation. The Applicant's corrective actions are in documents referenced in Subpart 1B, Specific Interrogatory 1, NRC First Response to Intervenor's Second Set of Interrogatories.

Violation 1.a. (Region III Tracking Items No. 456/83-09-07(A); No. 457/83-09-07(A)) has been assigned to NRC Inspector J. Muffett for review and closeout.

Violation 1.b. (Region III Tracking Items No. 456/83-09-07(B); No. 457/83-09-07(B)) has been assigned to NRC Inspector J. Jacobson for review and closeout.

Violation 1.c. (Region III Tracking Items No. 456/83-09-07(B); No. 457/83-09-07(B)) has been assigned to NRC Inspector J. Jacobson for review and closeout.

Subpart 12C - This subpart is a violation identified in Inspection Report No. 85-15/16 (Region III Tracking Item No. 456/85015-06). The Applicant's corrective action is documented in the June 21, 1985 letter referenced under Subpart 3B. A followup inspection is documented in Inspection Report No. 85-32/31.

Subpart 12D - This subpart is Violation 4.a. and 4.b. identified in the Notice of Violation of Inspection Report No. 84-44. These items

(Region III Tracking Items No. 456/84-44-08; No. 457/84-40-08; and No. 456/84-44-09; No. 457/84-40-09) were identified by CAT and are assigned to NRC Inspector P. Kaufman for review and closeout. The Applicant's corrective action is referenced under subpart 8B.

Subpart 12E - This subpart is Violation 2.a. identified in Inspection Report No. 85-06/07. This violation has been withdrawn. See June 27, 1985 letter from C. E. Norelius to Cordell Reed.

Subpart 12F - This subpart is a violation identified in Inspection Report No. 50-456/85006; No. 50-457/85006. The Applicant's corrective actions are documented in CEC's letter to NRC dated May 6, 1985 from D. L. Farrar to J. G. Keppler, and in NRC's letter to CEC dated June 27, 1985 from C. E. Norelius to Cordell Reed. NRC Inspector R. Gardner is responsible for review and closeout of this item (Region III Tracking Items No. 50-456/85006-01(B); No. 457/85006-01(B)).

Subpart 12G - This subpart is a violation identified in Inspection Report No. 50-456/84-21; No. 50-451/84-20. The Applicant's corrective action is described in CEC letters to NRC from D. L. Farrar to J. G. Keppler dated January 31, 1985, February 27, 1985, April 4, 1985, and April 16, 1985. The Staff conducted a followup inspection documented in Inspection Report No. 50-456/85-11; No. 50-457/85-11. NRC Inspector T. Tongue has been assigned responsibility for final review and closeout of this item (Region III Tracking Items No. 456/84-21-07; No. 457/84-20-07).

Subpart 12H - This subpart is a violation identified in Inspection Report No. 84-07. (Region III Tracking Items No. 456/84-07-06; No. 457/84-07-06). Mr. Kropp is responsible for review and closeout of the Applicant's corrective action documented in CECO's letter dated August 20, 1984 referenced under subpart 4A.

Subpart 12I - This subpart is a violation identified in IR 84-08 (Region III Tracking Items No. 50-456/84-08-02; No. 50-457/84-08-02). The Applicant's corrective action is documented in CECO's letters to the NRC from D. L. Farrar to J. G. Keppler dated June 21, 1984; September 12, 1984 and December 13, 1984. NRC Inspector J. Jacobson is responsible for review and closeout of this item.

Subpart 12J - This subpart is a concern stated by the CAT in the last paragraph, Overall Conclusions, Appendix A, IR 84-44/40. The Applicant was not required to respond to this concern in writing. IR 85-02, Report Details, Page 7 documents steps taken by the Applicant to resolve this concern (Region III Tracking Items No. 50-456/84-02-03; No. 457/84-02-03). This issue is addressed in internal NRC memoranda dated March 1, 1985 and April 12, 1985 from C. E. Norelius, Director, Division of Reactor Projects to J. G. Keppler, Regional Administrator which are attached to IR 85-06 and IR 85-18 respectively. NRC Inspector R. Gardner is responsible for review and closeout of this item.

Subpart 13B - This subpart is a violation identified in Inspection Report No. 50-456/84-43; No. 50-457/84-39 (Region III Tracking Items No. 456/

84-43-01; No. 457/84-39-01). The Applicant's corrective action is documented in the following CEC's letters to the NRC:

October 22, 1984 letter from L. O. DelGeorge to J. G. Keppler

December 11, 1984 letter from T. R. Tram to J. G. Keppler

April 22, 1985 letter from T. R. Tram to J. G. Keppler

NRC Inspector J. Muffett reviewed and closed this violation in IR 85-40/39. This violation did not evidence a significant breakdown in quality assurance.

Subpart 14B - This contention is Violation 4.a. through 4.d. in IR 83-09. (Region III Tracking Items No. 456/83-09-08(A), (B), (C), (D); No. 457/83-09-08(A), (B), (C), (D)). The Applicant's documents describing their corrective action are referenced in subpart 1B, Interrogatory 1, NRC Staff First Response to Intervenors Second Set of Interrogatories.

Violation 4.a. was identified by NRC Inspector R. Schultz who is also responsible for review and closeout. A followup inspection is documented in IR 85-32/31.

Violation 4.b. was identified by NRC Inspectors T. Vandel and P. Pelke is assigned responsibility for review and closeout. Inspection Report No. 50-456/85051; No. 50-457/85049 closed this item. The violation did not evidence a significant breakdown in quality assurance.

Violation 4.c. was identified by NRC Inspector R. Schulz who is also responsible for review and closeout. A followup inspection is documented in IR 85-32/31.

Violation 4.d. was identified by NRC Inspector I. Yin and is assigned to NRC Inspector J. Muffett for review and closeout.



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

RELATED CORRESPONDENCE

DOCKETED
USNRC

'85 DEC -6 P12:27

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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)

Docket No. 50-456
50-457

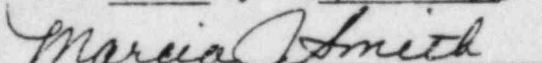
AFFIDAVIT OF WILLIAM S. LITTLE

I, William S. Little, being first duly sworn do depose and state:

1. I am employed as the Director, Braidwood Project, in the Division of Reactor Projects, U.S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137.
2. I have provided the answers to Specific Interrogatory 1 of the Staff's First Partial Response to Rorem's Second Set of Quality Assurance Interrogatories. These answers are true and correct to the best of my knowledge, information and belief.


William S. Little

Sworn to and subscribed before me
this 15 day of November 1985


Notary Public

My Commission Expires 2/6/86

My Commission Expires 2/6/86