



Commonwealth Edison

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DNF

November 4, 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.
50-456/85-032 and 50-457/85-031
NRC Docket Nos. 50-456 and 50-457

REFERENCE: (a) W. S. Little letter to C. Reed
dated October 4, 1985

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. R. D. Schulz and W. J. Kropp on June 24 through September 6, 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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Enclosure

cc: NRC Resident Inspector - Braidwood

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Commonwealth Edison Company
Response to Inspection Report
456/85-032 and 457/85-031
Items 456/85-032-02 and 457/85-031-02

As a result of the inspection conducted on June 24 through September 6, 1985, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violation consisting of two examples was identified:

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.

Phillips, Getschow Co. Construction Procedure, PGCP-1, Revision 14, November 1, 1984, "Control of Field Change Orders" states in part in Section 6.1.2 that the Field Change Order shall control removal/reinstallation of a component support.

Main steam pressure transmitter drawings 1PT-545, Sheet 2, Revision B, and 1PT-544, Sheet 2, Revision B, required the installation of a flexible metal hose. The drawings stated:

"Single pipe pressure instruments are recommended to have their sensing lines installed with a continuous slope (1/2" per foot recommended), however, it is acceptable to have horizontal runs without slope and a high point without high point vent valves provided no traps are formed."

Contrary to the above:

- a. A portion of component support 2CC76001T was removed after installation as directed by field change order number 2CC-15817. The portion removed was a 2" x 2" x 3/8" x 9 1/2" long angle and a 3/8" x 3/4" pipe diameter U-bolt, however, a field change order was not written to control and provide for reinstallation of the angle and U-bolt which restrains the pipe.
- b. The flexible metal hoses required by drawings 1PT544, sheet 2 and 1PT-545, sheet 2, were installed with formed traps. The installations of 1PT-544 and 1PT-545 were accepted by piping, quality control inspectors on March 1, 1985 and February 14, 1985, respectively.

RESPONSE - ITEM a (456/85-032-02)

Commonwealth Edison Company does not agree this is an example of an item of noncompliance. Phillips, Getschow Co. (PGCo) Construction Procedure PGCP-1, Revision 14 does state that a Field Change Order (FCO) shall be used to control removal and reinstallation of component supports. PGCP-1 does not require the concurrent initiation of the FCO's for removal and reinstallation. Upon issuance of FCO 2CC-15817, the PGCo computer tracking system for component support status was updated to show support 2CC76001T as an incomplete support. Thus, the support tracking system adequately depicted installation status. The component support status would not be changed to complete until reinstallation of the removed parts. It is our understanding, however, that during the inspection period, the NRC Inspector was not aware of the PGCo computerized system for tracking component support status.

For FCO 2CC-15817, issued to control the removal of the 2" x 2" x 3/8" x 9 1/2" long angle and the 3/8" x 3/4" pipe diameter U-bolt (Items #1 & #3) of component support 2CC76001T, the "Remarks" block states, "Field is to write a Problem Report. Reinstall item #1 & #3 upon receipt of new revision from S&L." PGCo personnel believed at the time of the initiation of the FCO, that because of the amount of piping work involved the component support could not be reinstalled as designed. Thus, the above referenced Field Problem Report (F.P.R.) would be submitted to S&L for redesign of the support and subsequent reinstallation. This reinstallation would be performed per a newly issued FCO.

However, when the rework was completed, it was determined that the support could be used as designed. This was indicated by the FCO 2CC-15817 "Completion Remarks" which states, "Items removed and pipe work complete. No F.P.R. needed. New material can be ordered using original rev.".

After field completion of FCO 2CC-15817 PGCo Production personnel requested PGCo Engineering to initiate an FCO for the reinstallation of the affected support. FCO 2CC-19377 was issued on 7/31/85. The "Remarks" block states, "Items #1 & #3 of support 2CC76001T were removed per FCO # 2CC-15817 in order to perform piping work. The new location of the pipe is such that new items #1 and #3 can be installed to the same design using the M-999 tolerances. Production shall order and install new items # 1 and #3 per this FCO." Thus, adequate controls were in place to assure the reinstallation of the removed parts. Commonwealth Edison believes that PGCo Procedure PGCP-1 was not violated.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Not Applicable

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Not Applicable

DATE OF FULL COMPLIANCE

Not Applicable

RESPONSE - ITEM b (457/85-031-02)

Commonwealth Edison concurs that the flexible hoses for 1PT-544 and 1PT-545 were installed with traps in violation of the established criteria. These deficiencies were identified on Phillips, Getschow Co. (PGCo) NCR's 4388 and 5054 respectively. Additionally, a similar deficiency has been identified by PGCo on the flexible hose for 1LT-559 which was documented on PGCo NCR 5105. PGCo NCR's 5105 and 5054 were closed on 8/22/85 and 9/24/85 respectively, after completion of the required rework. Rework has been completed on 1PT-544 and PGCo NCR 4388 is in the closure cycle.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

For instrumentation flexible hoses (Unit 1) within the ASME code jurisdictional boundary, Sargent & Lundy (S&L) has performed a walkdown of the instrumentation flexible hoses under cold plant conditions. A functional review of the results of this walkdown was performed by S&L and ECN's are being issued as required for necessary reroutes.

For instrumentation flexible hoses (Unit 1) within the ANSI B31.1 Code jurisdictional boundary classified as class H (safety related), PGCo is submitting the necessary dimensions to S&L on As-Construct Drawings. S&L will perform a functional review of the hoses to determine whether reroutes are necessary.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

On July 15, 1985, S&L issued ECN 27101 to drawing M-819-1 to clarify flexible hose configuration acceptance criteria. The ECN adds the following to Note 29 of the drawing:

- c. For AE-designed flexible hose configurations in instrument sensing lines, consideration has been given to hose/piping sloping requirements. Flexible hoses shall be installed and inspected to conform with the unique flexible hose configuration dimensions specified on the AE's piping isometric drawings. For all safety-related hoses (i.e., Class B, C and H), actual configuration shall be field checked at hot plant conditions to verify the absence of low points due to hose sag (single and differential pressure instruments) and/or high points (differential pressure instruments only). Hose configurations identified with such low points or high points shall be submitted to the AE for disposition.

A procedure will be developed to define actions to be taken during hot plant conditions for collection and evaluation of data for flexible hoses. At this time, it has not been determined who will perform these actions. S&L is developing a new ECN to clarify the scope of ECN 27101 to include Class H flexible hoses. PGCo will revise construction procedure PGCP-31 to incorporate the new ECN requirements.

DATE OF FULL COMPLIANCE

Date of full compliance is contingent upon the collection and evaluation of the flexible hose data during hot plant conditions and the completion of any required rework. All work is expected to be completed by respective unit fuel load.

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