



Commonwealth Edison
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November 2, 1984

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 Report
Nos. 50-456/84-05 and 50-457/84-05
NRC Docket Nos. 50-456 and 50-457

References (a): R. F. Warnick Letter to Cordell Reed
dated July 2, 1984

(b): D. L. Farrar Letter to J. G. Keppler
dated August 10, 1984

(c): D. H. Smith Letter to J. G. Keppler
dated September 11, 1984

Dear Mr. Keppler:

This letter provides additional response to the inspection conducted by Messrs. H. W. Kerch, R. H. Harris and R. M. Campbell of the Region I Office on March 26 through April 6, and April 9 through 20, 1984, of activities at our Braidwood Station. Reference (a) indicated that certain activities appeared to be in non-compliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation as appended to Reference (a) was provided by reference (b) and supplemented by reference (c).

Reference (b) indicated that The expected date of full compliance for items C.1.c and C.2 would be November 15, 1984. Due to certain construction considerations these items will not be complete until approximately January 7, 1985. A current status on these items and the completed status of items C.1.a and C.1.b is included in the enclosure to this letter.

Should you or your staff have any questions concerning these items please contact this office.

Respectfully,

David H. Smith
Nuclear Licensing Administrator

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Enclosure

cc: NRC Resident Inspector-Braidwood

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ENCLOSURE

SUPPLEMENTAL RESPONSE TO INSPECTION REPORT

50-456/84-05 AND 50-457/84-05

ITEM 456/84-05/06 AND 457/84-05/06

ITEM C CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

- 1a. In regard to Weld No. WØ 44-FW 11 R5, a subsequent review of the radiograph in question prompted Commonwealth Edison to perform a visual inspection of the weld O.D. surface. Visual inspection revealed a surface indication in the same area that the NRC had identified incomplete fusion. As a result, prior to performing the repair that was committed to by Commonwealth Edison in the initial response, the weld was radiographed to determine if the image of the surface indication corresponded to the same image identified as incomplete fusion on the NRC film. Due to the similarity, the surface indication was mechanically removed and the subject weld was subsequently radiographed. The results of the radiographic inspection utilizing Kodak "R" film clearly indicated that the indication identified on the initial film, (which corresponded to the image produced by the NRC) was no longer present.

An explanation as to why this indication did not appear on the Independent Testing Laboratory's film on file with Commonwealth Edison is that the surface indication was not present when initial radiography was performed. Based on the above, the sensitivity of the initial radiograph can not be questioned, as the required T-hole on the properly located penetrameter was clearly visible.

As a result, Commonwealth Edison feels that this item has been satisfactorily resolved.

- 1b. Upon further investigation of Weld No. CV 17-FW 2C R5, it was determined that the site Mechanical Contractor had removed the subject weld per Field Change Order (FCO) #7581, dated August 15, 1984. As a result, this weld need not be repaired. It should be noted that the site Mechanical Contractor has taken the necessary steps to preclude this item from being installed in the future. Currently, Hold Tag #RI-164 is affixed to the item for controlling purposes.

The formal instruction committed to in the Corrective Action section of the initial response, has yet to be administered. Because Item of Noncompliance C.2 also requires formal instruction, (to both the Mechanical Contractor and Independent Testing Laboratory radiographic interpreters) this instruction

will be addressed under Item of Noncompliance C.2.
Administering the formal training as detailed below will
negate the need for two training sessions which are so closely
related.

1c&2 Weld Nos. SI 14-FW 9 and SI 13-FW 15 R1 have not been
reinspected to date. Due to flushing operations of the Safety
Injection System, the necessary radiographic inspections have
been curtailed.

Access to the subject welds is anticipated in late November,
and completion of corrective actions, as applicable, will be
performed no later than January 7, 1985.

The actions needed to achieve full compliance are as follows:

- 1) Inspect, disposition and repair (as applicable) Weld
Nos. SI 14-FW 9 and SI 13-FW 15 R1.
- 2) Provide formal instruction to the Independent Testing
Laboratory and Mechanical Contractor for Item of
Noncompliance C, (1b) and (2).
- 3) Disposition CECO NCR #605.

ITEM C DATE OF FULL COMPLIANCE

- 1a. Complete.
- 1b. Complete.
- 1c. Completion expected January 7, 1985.
2. Completion expected January 7, 1985.