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December 11, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|---------------------------------|---|---------------------------------|
| In the Matter of |) | |
| COMMONWEALTH EDISON COMPANY |) | Docket Nos 50-237-SP |
| (Dresden Station, Units 2 & 3)) |) | 50-249-SP |
| |) | (Spent Fuel Pool |
| |) | Modification) |

Dear Administrative Judges:

Enclosed are the close-out documents in respect of the NSC audit of Brooks and Perkins on December 12 and 13, 1979 (Intervenor's Ex. 3), together with Mr. Shewski's authenticating affidavit. With the agreement of Intervenor, the Board previously granted Applicant permission to submit these close-out documents so that the record would be complete. (Tr. 511-512). We therefore request that they be admitted into the record as Intervenor's Exhibit 3B.

We also submit herewith additional corrections which Applicant overlooked in its initial review of the transcript. In addition, we note that Intervenor's Exhibits 12, 13A and 13B (The INPO Audit, the NRC Health Physics Appraisal and the Commonwealth Edison Company response to the NRC) and NRC Staff Ex. 1 (the Safety Evaluation and EIA) although received into evidence were not bound in the record as were the other exhibits. Similarly, the supplemental testimony of Millard L. Wohl was admitted into evidence (Tr. 674) but not bound into Applicant's copy of the transcript. Finally, we were unable to interpret lines 15 through 17 on page 477 of the transcript. The recollection of Applicant's witnesses and counsel is that Dr. Remick's comment was that although Keff decreases with increasing

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1980 DEC 15 PM 3 20

DISTRIBUTION SERVICES UNIT


December 11, 1980

Page Two

water temperature, this temperature effect might not be sufficient to terminate a criticality accident in the spent fuel pool, depending upon the amount by which Keff initially is assumed to exceed 1.0. However, we cannot reconcile this memory with the words in the transcript.

This letter is also to inform you that during the December 18, 1980 conference call, Applicant will request permission from the Board to file its proposed findings of fact as to all issues except fuel channel bowing on December 22, 1980.

Sincerely,



Philip P. Steptoe

PPS/kb
ENCS.

CC: Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of) Docket Nos. 50-237
) 50-249
COMMONWEALTH EDISON COMPANY) (Spent Fuel Pool
) Modification)
(Dresden Station, Units 2 & 3))

AFFIDAVIT OF WALTER J. SHEWSKI

Walter J. Shewski, on oath, states:

1. I, Walter J. Shewski, being first duly sworn, depose and state that I have personal knowledge of the matters set forth in this affidavit and that I could competently testify as to these matters if I am called as a witness in this proceeding.

2. I am the corporate Manager of Quality Assurance for Commonwealth Edison Company. My credentials were attached to my prefiled testimony filed with this Board on November 4, 1980.

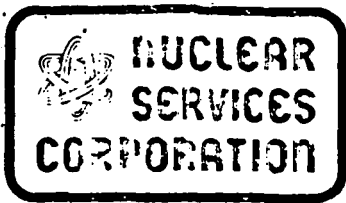
3. The attached document "Closeout of NSC Audit of Brooks & Perkins December 12 and 13, 1979" dated April 28, 1980 is an accurate and complete copy of Nuclear Services Corporation's closeout documentation of their audit of Brooks and Perkins dated December 12 and 13, 1979 (Intervenor's Exhibit No. 3.).

Walter J. Shewski
Walter J. Shewski

State of Illinois)
) SS:
County of Cook)

Signed and sworn to before me, a Notary Public,
This 8th day of December, 1980.

Laurence A. Molinaro
Notary Public
Commission Expires: 3-7-83



1700 DILL AVENUE CAMPBELL, CALIFORNIA 95008 TELEPHONE (408) 446-2500 TWX 910-590-2438



April 28, 1980
NSC-COM - 0219-0220-L254

Mr. H. Studtmann
Quality Assurance Supervisor
Commonwealth Edison, Zion Station
101 Shiloh Road
Zion, Illinois 60099


SUBJECT: Close-out of NSC Audit of Brooks & Perkins - Dec. 12 and
13, 1979.

Dear Henry:

Attached are the Brooks & Perkins audit responses and close out
of NSC audit of Brooks & Perkins dated December 12 - 13, 1979.
Also attached is the Leckenby fabrication procedure No. 6738-5,
Rev. 4, which specifies the documentation submittal requirements.

If you have further questions, please contact the undersigned.

Very truly yours,


Mr. J.R. Reddy
Project Quality Assurance
Engineer

JRR/dk

NUCLEAR SERVICES CORPORATION



March 13, 1980

COM-0219/0220

MEMORANDUM

TO: ✓ QA File

FROM: J. R. Reddy 

SUBJECT: NSC Audit of Brooks & Perkins, Inc. (Commonwealth Edison)
December 12 and 13, 1979

Reference: Brooks & Perkins Corrective Action Response, dated
February 19, 1980

The corrective action responses to the audit findings and observations noted in the subject Audit Report have been reviewed and found to be adequate. The implementations of the proposed corrective actions shall be verified on the next surveillance visit to Brooks & Perkins.

ct

cc: J. McCoy

(b+p) Brooks & Perkins, Incorporated

Advanced Structures Division • 12633 Inkster Road • Livonia, Michigan 48150 • (313) 522-2000

January 31, 1980

RECEIVED

FEB 4 1980

QUALITY MANAGEMENT
SYSTEMS

Nuclear Services Corporation
1700 Dell Avenue
Campbell, California 95008
Attention: J. R. Reddy

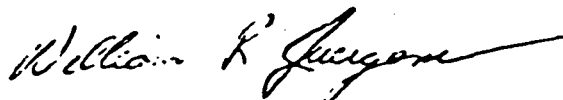
Subject: NSC Audit of Brooks & Perkins, Inc. - December 12 and 13, 1979

Dear Mr. Reddy:

We are in receipt of your audit report dated 12/26/79. The subject involved is B&P implementation of corrective action and response to observations resulting from the NSC audit of B&P.

As you know, based on our conversation today, we have responded verbally to you as to B&P's intent for satisfying the audit finding and observations. However, correction action has yet to be implemented. Our program is to complete the requested corrective action by Feb. 18, 1980; therefore we request an extension of fifteen days to respond to the NSC audit report.

Sincerely,



William R. Juergens
Quality Assurance Manager

b+p *Brooks & Perkins, Incorporated*

Advanced Structures Division • 12633 Inkster Road • Livonia, Michigan 48150 • (313) 522-2000

February 19, 1980

RECEIVED

FEB 25 1980

QUALITY MANAGEMENT
SYSTEMS

Nuclear Services Corporation
1700 Dell Avenue
Campbell, California 95008
Attention: J. R. Reddy

Subject: NSC Audit of Brooks & Perkins, Inc., December 12 & 13, 1979

Dear Mr. Reddy:

The following is a response to your audit findings of December 12 & 13, 1979. The response will be in three parts: the first part will restate the finding, the second part will identify corrective action that was taken, and the third part will state the date for completing the corrective action.

Finding #1

Quality Assurance procedure for compliance with 10 CFR Part 21 is not established

Corrective Action

Establish a Quality Assurance Procedure that defines methods and responsibilities for compliance with 10 CFR Part 21.

Completion Date

Procedure BP-15002 QAP "Reporting of Defects and Non-Compliance with Reference to 10 CFR Part 21" has been completed and issued on Feb. 19, 1980.

Observation #1

Purchase orders issued by Brooks & Perkins do not specify the requirement for access to vendor's plant.

Corrective Action

None Required. Brooks & Perkins has been offered plant access to each supplier of safety related material. It is Brooks & Perkins opinion that specific mention of plant access on the Purchase Order is not necessary at this time.

Completion Date

Not Applicable

Observation #2

Procedure BP-10033 QAP reference BP-10031 QAP, paragraph 4.3.2.1. This paragraph does not exist in BP-10031 QAP.

Corrective Action

Procedure shall be revised to correct typographical error.

Completed Date

January 18, 1980

Observation #3

Personal tools are used by production and are not subject to calibration under the Tool and Gage Control Program.

Corrective Action

None Required. All final inspections are performed with calibrated equipment. B&P also believes that personal equipment is given better care and maintenance by the employee than is company owned equipment. All employees have the opportunity to have their personal equipment calibrated by Brooks & Perkins Tool Inspection.

Completion Date

Not Applicable

Observation #4

Purchasing does not follow through on MRB action to the suppliers to preclude recurrence when the deficiency is the responsibility of the supplier.

Corrective Action

Copies of all Material Review Reports that involve the supplier will be routed to the Purchasing Manager.

Completion Date

February 18, 1980

Observation #5

The neutron attenuation test results are documented but the organization who performed the test analysis is not identified.

Corrective Action

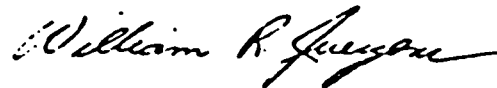
The report form shall be revised to include areas for test personnel title and organization.

Completion Date

February 19, 1980

If there are any further questions concerning the audit, please feel free to contact the undersigned.

Sincerely,



William R. Juergens
Quality Assurance Manager

cc: G. Flavin
L. Mollon
file

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
COMMONWEALTH EDISON COMPANY) Docket Nos. 50-237-SP
(Dresden Station, Units 2 & 3)) 50-249-SP
(Spent Fuel Pool
Modification)

APPLICANT'S ADDITIONAL CORRECTIONS
TO TRANSCRIPT OF NRC HEARINGS CONDUCTED ON
NOVEMBER 19-21, 1980

| <u>Page</u> | <u>Line</u> | <u>Transcript Correction</u> |
|-------------|-------------|---|
| 194 | 12 | "inadequate" should follow "contained" |
| 338 | 11 | "JOEL" should be "JOE" |
| | 24 | "Joel" should be "Joe" |
| 340 | 2 | "is" should be "if" |
| | 3 | "bulk" should be "bow" |
| | | insert "delete" after "line," |
| | 6 | "devised" should be "revised" |
| | 7 | "channel" should be "channeled" |
| 341 | 6 | "Joel" should be "Joe" |
| 344 | 3 | insert "its" after "whether" |
| | | "corrective" should be "correct" |
| 346 | 3 | "in likened form" should be "likely to be present" |
| | 12 | delete "at" |
| 347 | 12 | insert "per million" after "parts" |
| 349 | 5 | "stream" should be "screen" |
| | 6 | "stream" should be "screen" |

| <u>Page</u> | <u>Line</u> | <u>Transcript Correction</u> |
|-------------|-------------|---------------------------------------|
| 350 | 23 | "test" should be "testimony" |
| 351 | 3 | insert "conductivity or" after "low" |
| 352 | 2 | "thermanic" should be "thermodynamic" |
| | | "prepare it" should be "occur" |
| | 23 | "sights" should be "sites" |
| | | delete "the" after "cause sites of" |
| 353 | 2 | "unduly out of" should be "an undue" |
| | | "with" should be "of" |
| | 3 | "on it" should be "ion" |
| | | "as" should be "or" |
| | 6 | "bulk" should be "bulge" |
| | 16 | "bulk" should be "bulge" |
| | 22 | "bulk" should be "bulge" |
| 354 | 7 | "interface" should be "innerface" |
| | 13 | "their" should be "there" |
| | 15 | "basis" should be "axis" |
| | 16 | "When the" should be "The" |
| | 19 | "bulk" should be "bulge" |
| | 20 | "bulk" should be "bulge" |
| | 21 | "bulk" should be "bulge" |
| 355 | 3 | "boron" should be "boral" |
| | 8 | "test" should be "testimony" |
| | 17 | "discovery" should be "discover" |
| | 23 | add "of" between "because" and "the" |
| | | delete "in" |

| <u>Page</u> | <u>Line</u> | <u>Transcript Correction</u> |
|-------------|-------------|--|
| 355 | 24 | "it would melt" should be "initial metal" add "for" between "was" and "the" |
| 356 | 4 | "verify" should be "verified" |
| | 23 | "Contained in" should be "consisting of" |
| 357 | 4 | "condensity" should be "density" |
| | | "use" should be "used" |
| | 15 | "acceptable" should be "exceptional" |
| | 21 | "but" should be "so" |
| 359 | 24 | "selective" should be "selected" |
| 362 | 15 | "done" should be "a problem" |
| 363 | 4 | "full-scaled" should be "full-scale" |
| 365 | 1 | "some elements" should be "'some elements'" |
| | 13 | add "an" between "if" and "extensive" |
| 366 | 3 | "policy" should be "flow" |
| 369 | 22 | "days to extrapolate" should be "data that incorporate" |
| 370 | 5 | "great" should be "rate" |
| | 11 | add "compared" between "small" and "to" add "acceptable" between "of" and "corrosion" |
| 371 | 19 | add "not" between "interested" and "in" |
| 372 | 18 | "side" should be "site" |
| 373 | 3 | Add "are a" between "racks" and "checkerboard" |
| | 17 | "formally" should be "forming" |
| | 22 | "Drayler" should be "Draley" |
| | 25 | add "I want to" after "Record." |
| 374 | 1 | "Make" should be "make" "you're" should be "we're" |

| <u>Page</u> | <u>Line</u> | <u>Transcript Correction</u> |
|-------------|-------------|---|
| 374 | 10 | "boron" should be "boral" |
| | 24 | "consideration" should be "'corrosion considerations" |
| | 25 | add " after "racks." |
| 375 | 5 | "boron" should be "boral" |
| 377 | 3 | "merely" should be "nearly" |
| 379 | 21 | add "in" between "that" and "20" |
| | | "in" should be "and" |
| | | delete "of" |
| | 25 | add "DR. LITTLE" before "So" |
| 443 | 1 | "competition" should be "composition" |
| 463 | 2 | "assemblies" should be "assembly" |
| 464 | 4 | "of" should be "or" |
| | | "assembly" should be "assemblies" |
| 466 | 23 | "whole" should be "hole" |
| 467 | 24 | "the low" should be "below" |
| 468 | 9 | "what happened" should be "half" |
| | 15 | "pit" should be "assembly" |
| | 16 | "pit" should be "assembly" |
| | 18 | "Zion" should be "Dresden" |
| 469 | 4 | "posted" should be "proposed" |
| 470 | 6 | "absorber's" should be "absorbing" |
| | 14 | "actual" should be "axial" |
| | 21 | "actual" should be "axial" |
| 471 | 15 | "actual" should be "axial" |

| <u>Page</u> | <u>Line</u> | <u>Transcript Correction</u> |
|-------------|-------------|---|
| 472 | 6 | "lay" should be "layer" |
| | 7 | "neutron" should be "neutrons" |
| | 8 | "compare" should be "compares" |
| | 12 | "and" should be "in" |
| | 20 | "light" should be "like" |
| 473 | 18 | "of" should be "or" |
| | 21 | "extended" should be "standard" |
| | 24 | "in" should be "N" |
| 474 | 1 | "reference" should be "referenced" |
| | 2 | "I9.12" should be "9.1.2" |
| | 24 | "absorber" should be "absorbed" |
| 476 | 6 | "tube" should be "too" |
| 478 | 11 | "doesn't absorb the plate" should be "doesn't have absorber plate" |
| | 19 | "assembly" should be "assemblies" |
| 480 | 24 | "reactor activity" should be "reactivity" |
| 481 | 3 | "reactor activity" should be "reactivity" |
| | 7 | "reactor activity" should be "reactivity" |
| | 13 | "reactor activity" should be "reactivity" |
| | 23 | "plates required" should be "plates of the required" |
| 483 | 10 | "Pekins" should be "Pickens" |
| 485 | 25 | "conserving" should be "conservative" |
| 487 | 1 | add "in" between "increase" and "reactivity" |
| 488 | 12 | "temporary" should be "temperature" |
| 489 | 16 | "count as" should be "encounters" |
| | 21 | "effect" should be "effective" |

| <u>Page</u> | <u>Line</u> | <u>Transcript Correction</u> | |
|-------------|-------------|--|---|
| 490 | 22 | "pro-TE" should be "Branch Technical" | |
| | 24 | "rate" should be "array" | |
| 491 | 1 | "rate" should be "array" | |
| | 2 | "rate" should be "array" | |
| | 10 | "deficiency" should be "efficiency" | |
| | 11 | "deficiency" should be "efficiency" | |
| 492 | 23 | "fuel pool" should be "full flow" | |
| | 1 | "prorata" should be "flow rate" | |
| | 2 | "prorata" should be "flow rate" | |
| | | "a subtraction" should be "some fraction:" | |
| | 7 | "prorate" should be "flow rate" | |
| | 8 | "prorat" should be "flow rate" | |
| | 10 | "fuel pool" should be "full flow" | |
| | 11 | "fuel pool" should be "full flow" | |
| | 17 | "prorate" should be "flow rate" | |
| | 493 | 14 | "mineralizers" should be "demineralizers" |
| | | 20 | "new rate" should be "NUREG" |
| 22 | | "mineralizers" should be "demineralizers" | |
| 502 | 3 | "1.198" should be "6.198" | |
| | 4 | ".142" should be ".042" | |
| | | "bid" should be "pitch" | |