

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

COMMONWEALTH EDISON COMPANY

(Zion Station, Units 1 and 2)

}
}
} Docket Nos. 50-295
50-304
}

NRC STAFF TESTIMONY
ON CONTENTION 2(1)

by

Joel E. Kohler

Contention 2(1) states as follows:

The Applicant has not described the procedures it intends to employ to prevent the installation and use of damaged and defective racks.

The proposed modification of the Zion spent fuel pool is to be performed in accordance with Commonwealth Edison Quality Assurance Program (CECo-QAP) and commitments contained in the April 13, 1978 license modification application, as supplemented. The modification, consisting of engineering, material purchase, fabrication, and installation, is to be controlled by the Zion Generating Station QA implementing procedures as described in the testimony of Messrs. Leider and Shewski presented on behalf of Commonwealth Edison in this proceeding.

The Commonwealth Edison Quality Assurance Program, as applicable to the Zion Generating Station, has been reviewed and found acceptable for use by the NRC Staff. Region III of the NRC Office of Inspection and Enforcement (OIE) has found that the program has been satisfactorily implemented at the Zion Generating

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Station. It is the Region III position that adherence to the requirements of the CECO-QAP should result in the acceptable fabrication and installation of the fuel storage racks.

To verify compliance with the CECO QA Program, Region III inspectors will inspect the spent fuel pool modification activities on a sampling basis in accordance with existing NRC inspection requirements. These include verification of the following:

1. Procurement review to determine that supplied material meets the commitments specified by CECO;
2. Receipt and storage inspections of purchased material to determine that CECO has performed the required inspection of purchased material and that requirements for storage of material are being met;
3. Installation inspection to confirm the following;
 - a. dimensional checks
 - b. field welds
 - c. qualification of welders and procedures
 - d. removal of old racks
 - e. rack alignment
 - f. seismic restraint
 - g. rack fasteners

- h. corrosion test specimen installation in spent fuel pool
 - i. special commitments such as drilling vent holes to prevent plugging
 - j. final clearance check using dummy fuel element or other go/no-go gage
4. Inspection of spent fuel storage racks and fuel to determine;
- a. Cleanliness
 - b. Obvious defects
 - c. Identification
 - d. Appearance and size of welds
 - e. Technical Specifications are being met
 - f. Fuel storage in accordance with commitments
5. Implementation of administrative controls governing;
- a. control of heavy loads over pool
 - b. schedule for examination of specimen
 - c. procedure for periodically checking for swelling and other degradation.
6. Observation of work in progress to determine;
- a. proper location and orientation
 - b. placement of seismic restraints
 - c. procedural verification
 - d. QC coverage

7. Review of Records;

- a. receiving inspection
- b. shop fabrication records
- c. material certification
- d. Installation records
- e. Nonconformance reports
- f. QA audits

Additionally, Region III, OIE, will inspect on a sampling basis other commitments made by CECO in its spent fuel pool modification application. Through these inspections, Region III will verify that the racks are suitable for service or take necessary measures to prohibit their use.