



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

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JUN 29 1979

Docket No. 50-373  
Docket No. 50-374

Commonwealth Edison Company  
ATTN: Mr. Byron Lee, Jr.  
Vice President  
P. O. Box 767  
Chicago, IL 60690

Gentlemen:

This is in response to your letter dated June 1, 1979, informing us of the steps you have taken to correct the noncompliance identified in our letter dated May 1, 1979.

Regarding Item 1.A, the CECO response addressed Section 7.5.2.2.b.1 of the La Salle FSAR. According to NRR, the exception identified in this section does not exclude associated components (i.e., transmitters, cables, etc.) from being classified as safety related. The exception pertains to the malfunction of recorders and indicators during a seismic activity but not afterwards. The recorders and indicators must withstand the seismic activity. If you feel that the "safety related" aspects of this matter as opposed to the seismic qualifications are still matters of discussion with NRR, we will reconsider the appropriateness of our enforcement action. We currently consider the noncompliance as valid. Therefore, submit to this office within thirty days of your receipt of this notice a written statement or explanation in reply: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

Regarding Item 1.B, your response for corrective action to avoid further noncompliance identified a review of all safety-related HVAC systems. We will assume that your actions will encompass the identification and control of similar situations for all safety-related components regardless of systems.

With respect to item number 4, our enforcement conclusion remains unchanged based on the following observations:

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1. Your audit program is intended to ensure that timely inspections are performed on ongoing activities and thereby assure the QA program effectiveness. Our inspection identified an area where timely inspections were not performed and documented in a sequence compatible with the work in progress. This inadequacy which involved the installation of the various seismic category 1 nuclear steam supply system panels, specifically identified that:
  - a. The projected lengths of embeded bolts, which hold down the NSSS panels and prevent them from being damaged in case a seismic event takes place, were less than the specified 3".
  - b. The clearance between some panel frames and the floor were either less than the specified 1 1/2" or more than 2".
  - c. A reactor equipment drain line was installed through a seismic category 1 NSSS panel No. 1HP22P074.
  - d. The storage condition of panel 1H22P009 installed at approximate elevation 710' on the south side of the containment was not protected after installation as were the other installed panels.

What's more, we feel the identified problems went undetected because the activity was neither audited nor surveyed. Therefore, we believe that a mechanism to detect and correct inadequacies in a timely manner was rendered ineffective in this case.

2. Surveillances are included in the scope of your QA program. Effective surveillance of ongoing activities should have identified that the Morrison Construction Company (MCC) inspection procedure PC-10 could not be properly implemented for the following reasons:
  - a. Manufacturer's Instruction Manuals and or Special Instructions were not obtained and distributed to the installation/inspection personnel as stipulated in Paragraph 2.1 of the procedure PC-10.
  - b. Verification, that the equipment base and the foundations are compatible, was not performed as required in Paragraph 4.1 of procedure PC-10.
  - c. As acknowledged in your response, no installation tolerances were specified for the panels, consequently, acceptance/rejection criteria were absent for adequate inspections. Records indicate that the base mat was poured in October 1974.

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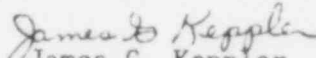
3. Even though the sequence of the installation of the NSSS panels includes work performed by Walsh Company who installed the foundation bolts and poured the base mat in 1974, your proposed audit is being limited to MCC's procedure PC-10.

The above discussion is presented as the basis for our concern that your audit program which relies on surveillances and audits may not focus sufficiently on interface activities where more than one contractor is involved in the installation of equipment.

In addition to the above, we do not feel that you have addressed the concerns expressed in our May 1, 1979, letter in which we requested your planned efforts to inspect and verify the adequacy of the installations identified in noncompliance Items 1.C and 2. We request that additional information be forwarded to this office within 20 days.

If you have any questions concerning this matter, please contact this office.

Sincerely,

  
James G. Keppler  
Director

cc: Mr. L. J. Burke, Site  
Project Superintendent  
Mr. T. E. Quaka, QA  
Supervisor  
Mr. R. H. Holyoak, Station  
Superintendent

cc w/ltr dtd 6/1/79:  
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Mr. Dean Hansell, Office of  
Assistant Attorney General

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