



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
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May 17, 1979

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Zion Station Unit 2
Response to IE Inspection Report
No. 50-304/79-04
NRC Docket No. 50-304

Reference (a): April 18, 1979 letter from G. Fiorelli
to Byron Lee, Jr. transmitting IE
Inspection Report No. 50-304/79-04

Dear Mr. Keppler:

An inspection was conducted by Mr. W. J. Key of your office on March 12-13 and April 3-4, 1979 of activities at Zion Station Unit 2. As indicated in Reference (a), during this inspection certain activities appeared to be in non-compliance with NRC requirements. Commonwealth Edison Company's response to the apparent item of noncompliance is contained in Attachment A to this letter. Based on the information contained in this response, Commonwealth Edison respectfully requests the NRC inspector to change the infraction to an observation.

Please address any questions that you might have on this matter to this office.

Very truly yours,

C. Reed

Cordell Reed
Assistant Vice-President

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ATTACHMENT A

10 CFR 50, Appendix B, Criterion XII, states, in part that "Measures shall be established to assure that tools, gauges, instruments ... are properly controlled, calibrated and adjusted..."

The ASME Boiler and Pressure Vessel Code, Section XI, incorporates ASME, Section III, Subparagraph NA 4610 which states, in part that "Calibration shall be against certified measurement standards which have known relationships to national standards..."

Commonwealth Edison Company (CECo.) QA Manual, Quality Requirement QR No. 12.0, Section 12.2, states in part that "Inspection, measuring and test equipment will be adjusted and calibrated using documented procedures at scheduled intervals against certified standards having known valid relationships to recognized standards."

Contrary to the above mentioned requirements, on April 4, 1979, the NRC inspector observed that the calibration step wedge being used to calibrate the X-Rite Model 301 densitometer, S/N 2699, located in the CONAM portable radiographic facility, was not certified to a known recognized standard as required by paragraph T-234.2 of ASME Section V.

RESPONSE:

CONAM was employed by the licensee to perform radiographic weld construction examinations for plant modification work. This non-destructive examination (NDE) was not related to the licensee's Inservice Inspection Program. NDE contractors who perform construction examinations conduct non-destructive examinations in accordance with licensee procedures pursuant to Commonwealth Edison Company (CECo) QA Manual, which is in accordance with 10 CFR 50, Appendix B and ASME Sections III and V.

In the course of performing radiography and associated interpretations in accordance with the licensee's procedures, CONAM did not use the X-Rite Mode 301 densitometer or the calibration step wedge located in the CONAM owned portable radiographic facility. All radiographic interpretation performed by CONAM for this modification work, which included the inspection periods in March and April, 1979, was done by using a licensee owned and controlled Macbeth Model TD-501 densitometer, S/N 1108. Calibration of this densitometer was performed using a

licensee owned and controlled photographic step tablet, I.D. No. 117810, certified by National Bureau of Standards on November 15, 1978. Additionally, all radiographs are reviewed and interpreted by qualified licensee personnel using the same licensee owned equipment.

Since the inspector did not inspect nor review records of activities performed by CONAM or the licensee using non-certified equipment and since no ISI activities were performed by other contractors or the licensee using non-certified equipment, Commonwealth Edison has concluded that the basis for the item of noncompliance does not exist. Therefore, Commonwealth Edison requests the NRC inspector to reevaluate the apparent item of noncompliance and change it to an observation.