



**Commonwealth Edison**  
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June 18, 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: LaSalle County Station Units 1 and 2  
Response to IE Inspection Report Nos.  
50-373/79-17 and 50-374/79-11  
NRC Docket Nos. 50-373/374

Reference (a): G. Fiorelli letter to B. Lee, Jr.  
dated May 18, 1979

Dear Mr. Keppler:

The following is in response to the inspection conducted by Messrs. E. J. Gallagher, F. C. Hawkins, and J. H. Neisler on April 24-25, 1979 of activities at LaSalle County Station Units 1 and 2. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. These activities are addressed in the attachment to this letter.

Please refer any additional questions you may have on this matter to this office.

Very truly yours,

*C. Reed*

Cordell Reed  
Assistant Vice-President

attachment

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ATTACHMENTRESPONSE TO NOTICE OF VIOLATION

Items of apparent noncompliance identified in Appendix A of the NRC letter dated May 18, 1979 are responded to in the following paragraphs.

1. 10 CFR 50, Appendix B, Criterion IV requires, in part, that applicable regulatory requirements, design bases and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment and services, whether purchased by the applicant or by its contractors or subcontractors.

Commonwealth Edison Company Quality Procedure 4-1, Paragraph 4.6 states, in part, "Safety-related materials or parts that are manufacturer's standard product and not purchased to special requirements of a CECO. specification can be purchased from a supplier listed on an approved bidder's list and can be accepted at the plant site based on the supplier's or manufacturer's certificate of conformance."

Contrary to the above, the licensee's contractor, Walsh Construction Company procured, accepted and implemented the use of safety related grout material for the anchorage of the Quencher modification to the containment foundation in the Unit 1 and 2 suppression pool without specifying or receiving certificates of conformance or other evidence that the material met requirements. Further, special requirements were not included in the licensee's specification for the grout material.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Certificates of Compliance have subsequently been reviewed for Embeco 636 Grout. This material was determined to have met the Corps. of Engineers Specification CRD-C588 for expansive grouts. The analysis of the grout test results from 1976 to 1979 indicates that the grout strength exceeds the Corps. of Engineers' specifications and also exceeds the concrete strength requirements of 4000 psi at 90 days in accordance with Project Specification J-2533.

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The grout under the equipment bases is a filler material between the rough concrete support and the equipment base. It has to transmit compression and shear load for which the concrete foundation is designed. As long as the grout strength exceeds the design concrete strength, the grout is acceptable.

The grout manufacturer's specification also identifies expansion characteristics acceptable under CRD-C588. These characteristics have been reviewed by the architect engineer (Sargent & Lundy) and are acceptable. Because the grout expansion occurs during the plastic state before the grout is fully hardened and because the grout is not restrained, expansion beyond the maximum limits is not harmful to the function of the grout. Furthermore, expansion varying beyond the normal amount would be noticeable and could be repaired. Therefore, the expansion characteristics of the Embeco 636 grout is not a prime consideration, and testing is not require.

#### CORRECTIVE ACTION TO AVOID FURTHER NONCOMPLIANCE

In accordance with requirements established by the designer, the grout supplier will furnish a Manufacturer's Certificate of Conformance for the grout material to be used in the future for the Quencher modification in the suppression pool. As has been stated, Certificates of Conformance have been furnished and reviewed for material used in this modification.

In addition, the design specification will be revised to identify the Embeco 636 grout as safety related when used under safety-related equipment. The specification will also be revised to reflect the appropriate grout requirements, and all material procured prior to final issuance of this specification will meet these requirements.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Formal revision of the procurement and design documents will be completed in August, 1979. Appropriate instructions have been issued at the site to insure that the grout used prior to formal implementation of these changes satisfies all design requirements and that Certificates of Compliance as discussed above are received.

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2. 10 CFR 50, Appendix B, Criterion V, requires in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, ... and shall be accomplished in accordance with these instructions, procedures, or drawings.

CECo. Topical Report CE-1-A, Revision 5, Section 5 requires that, "The quality assurance actions carried out for design construction, testing and operation activities will be described in documented instructions, procedures, drawings, specifications, or checklists," and that, "These documents will assist personnel in assuring that important activities have been performed."

Contrary to the above, the inspector observed that:

- a. Six of nine 5,000 gallon shipments of 2090P-4 post-tensioning casing filler grease were not sampled during use and re-circulation in accordance with Sargent & Lundy Specification J-2592, Section 2-606.3 and tested in accordance with Procedure TP-TG, Rev. 0.
- b. Two of nine 5,000 gallon shipments of 2090P-4 post-tensioning casing filler grease were not sampled and tested upon their receipt at the project site as required by Sargent & Lundy Specification J-2592, Section 2-606.3.
- c. No documentation was available to substantiate that the producers certified test documentation for temporary protective grease (Visconorust 1601 and 1702) was being obtained by the testing contractor as required by Sargent & Lundy Specification J-2592, Section 2-606.1 and subsequently reviewed and maintained.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

- 2a. As required by Specification J-2592, Section 2-606.3, the casing filler (2090P-4) will be "sampled from the storage tanks as the material is being used and re-circulated."

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field or as required when taking samples off-site. Conam NCR #8 has been issued by Conam internally to address this problem.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

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At the time of the NRC visit, CECO. was unable to verify that samples for batches 2861, 3202, 242, 64, and 1563 were taken. CECO. Q.A. immediately requested Conam Inspection to obtain the grease samples in question.

On 6/12/79, CECO. received the results of these tests which were acceptable and are available for review.

The sample report for batch 559 was not available at the time of the NRC visit because chemical testing was not completed by the testing agency. On 6/12/79, CECO. received these results and they are available for review at the site. Furthermore, when greasing begins on Unit 2, Conam will perform the required sampling per Spec. J-2592.

- 2b. As a result of the NRC visit, the Inspection Agency has performed the required chemical testing of the grease samples in question as indicated in "2a" above. Furthermore, CECO. Q.A. has initiated NCR #310. Chemical tests were not performed per Spec. (J-2592) requirements (2-606) i.e., batch 2861 and 3202 received the first test but not the second. Batch 242 did not receive any tests. Batch 64 received the first test but test results were apparently misfiled. Batch 1563 was never sampled. NCR #310 is now under review by the AE.
- 2c. During the NRC visit, it was determined that the testing contractor did not obtain the producer's certified tests for "Visconorust 1601 and 1702. Since the time of the NRC visit, the testing contractor personnel have obtained the necessary producer's certified tests for Visconorust 1601 and 1702. They are available for review at the site.

CORRECTIVE ACTION TO AVOID FURTHER NONCOMPLIANCE

The contractors involved agreed to work more closely and be responsive to each others' needs, i.e., when shipments arrive on-site, Walsh will notify Conam that initial sampling can be obtained. Also, Walsh will not proceed with greasing until Conam is physically available to take grease samples as it is being recirculated. It is anticipated that greasing of tendons will begin in approximately 2-3 weeks. Furthermore, Conam will obtain copies of certified tests from Walsh as the grease arrives in the

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