



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

TIO

July 22, 1980

Docket No. 50-373

Commonwealth Edison Company  
ATTN: Mr. Cordell Reed  
Vice President  
Post Office Box 767  
Chicago, IL 60690

Gentlemen:

This is in response to your letters dated June 6 and July 7, 1980, informing us of the steps you have taken to correct the items of non-compliance identified in our letter of May 9, 1980. Based upon our review of the information in your letters, all of the items of non-compliance stand as written. We will examine your corrective actions during a future inspection.

With regard to your comment in your June 6 letter on our past practice related to the content of inspection reports, our practice has been and continues to be to discuss with a licensee at the exit interview or during subsequent telephone calls all items which will be in a Notice of Violation prior to the issuance of an inspection report.

With regard to your comment in your June 6 letter on our using the foreign material in the reactor vessel as an example of an item of noncompliance, we believe that the foreign material was introduced due to poor housekeeping. Unless you can determine that its source was not poor housekeeping but rather the deterioration of installed components such as control rod drive seals, the matter will remain an example of an item of noncompliance.

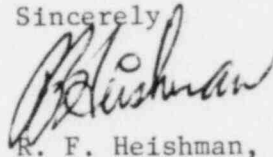
With regard to your June 6 response to Item 3, measuring and test equipment as covered by Criterion XII of 10 CFR Part 50, Appendix B, is not restricted to portable equipment. Criterion XII relates to the function of equipment, i.e. purpose for which it is being used, and not the physical characteristics of equipment, i.e. portable versus permanently installed.

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With regard to your June 6 response to Item 4, both 10 CFR Part 50, Appendix B, Criterion XVII, and ANSI N45.2, Paragraph 18, clearly indicate that preoperational test records include records of action taken in connection with any deficiencies noted. Therefore, such action must be documented at the time it is taken to be in accordance with the ANSI N45.2 statement that "...records shall be prepared as work is performed..." In many cases during the preoperational testing phase appropriate immediate corrective action might be limited to a documented evaluation before continuing a test. Subsequent to testing, corrective work related to the deficient conditions would be documented when the work is performed. We find your proposed corrective actions in response to Item 4 to be acceptable.

Your cooperation with us is appreciated.

Sincerely



R. F. Heishman, Chief  
Reactor Operations and  
Nuclear Support Branch

cc:

Mr. D. L. Peoples, Director  
of Nuclear Licensing  
Mr. L. J. Burke, Site  
Project Superintendent  
Mr. T. E. Quaka, Quality  
Assurance Supervisor  
Mr. R. H. Holyoak, Station  
Superintendent

cc w/ltr dtd 7/7/80:

Central Files  
Reproduction Unit NRC 20b  
PDR  
Local PDR  
NSIC  
TIC  
Mr. Dean Hansell, Office of  
Assistant Attorney General