Commonwealth Edison



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One First National Plaza, Chicago, Illinois Address Reply to: Post Office Box 767 Chicago, Illinois 60690

October 31, 1980

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

> Subject: Braidwood Station Units 1 and 2 Response to IE Inspection Reports No. 50-456/80-09 and 50-457/80-08 NRC Docket Nos. 50-456 and 50-457

References (a): October 9, 1980 letter from A. B. Davis to Cordell Reed transmitting IE Inspection Report No. 50-456/80-09 and 50-457/30-08

> (b): October 31, 1980 letter from T. R. Tramm to H. R. Denton

Dear Mr. Keppler:

Feference (a) contained the results of an inspection conducted by Mr. M. P. Phillips of your office on September 17-19 and 23, 1930, of activities at Braidwood Station. During that inspection certiain activities appeared to be in noncompliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the items of noncompliance.

Please andress any questions that you may concerning this matter to this office.

Very truly yours.

S. Abel

Director of Nuclear Licensing

Attachment

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NRC Docket Nos. 50-456 and 50-457

#### ATTACHMENT A

# Response to Notice of Violation

Items of apparent noncompliance identified in Appendix A of the NRC letter dated October 9, 1980, are addressed in the following paragraphs.

Item 1

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## Deficiency:

Section 3.E.5 of Construction Permits CPPR-132 and CPPR-133 requires, in part, that in addition to the preoperational monitoring program described in Section 6.1 of the Environmental Report, with amendments, the staff recommendations included in Section 6.1 of the Final Environmental Statement shall be followed. Section 6.1.5 of the Environmental Reports states, in part, that in accordance with CECo.'s commitment to start its preoperational radiological monitoring program at least 18 months before commercial operation, monitoring will begin in July 1979.

Contrary to these requirements, the radiological monitoring program has not yet begun.

### Corrective Action Taken:

As required by the Final Environmental Statement, the preoperational radiological monitoring program will be started at least two years prior to commercial operation. The date specified in Section 6.1.5 of the Environmental Report will be corrected in the first revision made to respond to NRC questions. In the interim, reference (b) affirmed Commonwealth Edison's commitment to comply with the FES requirement.

#### Item 2

## Deficiency:

Section 3.E.2 of Construction Permits CPPR-132 and CPPR-133 requires, in part, that a control program shall be established by the applicant to provide for a periodic review of all construction activities to assure that those activities conform to the environmental conditions set forth in this permit. The control program, "Onsite Environmental Monitoring Program," requires, in part, that the onsite coordinator or his designated representative shall conduct daily, weekly, and monthly checks of construction activities on the plant site using the check lists included in this procedure.

- a. Contrary to these requirements, no weekly checks were performed during the periods May 4-24, 1980; June 15-21, 1980; June 29-July 5, 1980; and July 13-26, 1960, despite the fact construction activities were resumed during April 1980.
- b. Contrary to these requirements, no daily checks have been performed since November 5, 1979, respite the fact that construction activities were resume thring April 1980.

## Corrective Action Taken

- a. Greater care is being taken to ensure that weekly checks are performed and that the reports are not lost in routing for approval. As of November 1, 1980, this will be done by hand carrying the reports through until they get to the Site Quality Assurance office.
- b. Beginning September 23, 1980, daily checks were resumed and the same care will be taken as mentioned above to ensure these reports are approved and filed.

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