



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

Dm13

JUN 1 1981

Docket No. 50-254
Docket No. 50-265

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



Gentlemen:

Thank you for your letter dated April 28, 1981, informing us of the steps you have taken to correct the items of noncompliance and providing us with additional information concerning the unresolved items and additional concerns which we brought to your attention in Inspection Report Nos. 50-254/81-04 and 50-265/81-04 forwarded by our letter dated April 3, 1981.

We understand, based on telephone discussions with members of your staff, Mr. R. L. Bax on May 5, 1981, Mr. J. R. Wunderlich on May 12, 1981 and Mr. J. S. Abel on May 21, 1981, that you have taken or will take the following additional actions:

1. For Noncompliance Item No. 1 in Attachment A to your letter, the inspection of all the cabling in the Unit 2 Cable Tunnel was performed by electricians and QC personnel who were supervised by the Assistant Superintendent of Maintenance. The results of this inspection are documented in Onsite Review No. 81-6.
2. For Noncompliance Item No. 2 in Attachment A to your letter, you will revise Standard Contract Requirement SCR-11 to include a requirement that cognizant station management personnel be notified prior to any fire barrier being degraded. This includes fire barriers being breached in addition to existing fire barrier penetration seals being opened. SCR-11 is a requirement of all contractors that work at the station.
3. For Noncompliance Item No. 3 in Attachment A to your letter, the necessary inspections to assure that the plant remains in a state of adequate cleanliness will be conducted by the Assistant Fire Marshall on a weekly basis. In his absence, the plant inspections will be conducted by an operations staff member. Deficiencies identified during these inspections will either be corrected immediately or transmitted in writing to the responsible station personnel for correction.
4. For Additional Concern No. 1 in Attachment B to your letter, two operating procedures, QOS 005-S13, "Operator Surveillance Turnover

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Sheet - Unit 1 Equipment Attendant," and QOS 005-S14, "Operator Surveillance Turnover Sheet - Unit 2 Equipment Attendant," will be revised to include inspection of all equipment and personnel hatches into the Unit 1 and 2 Cable Tunnels from the Auxiliary Electric Equipment Room and the Turbine Building 595' Level once each shift. This will provide verification that these hatches remain closed. The equipment hatch in the cable riser area from the Unit 2 Cable Tunnel (Turbine Building 595' Level, area F-G/12-13) has been locked closed.

These actions and those delineated in your letter are acceptable to mitigate the occurrence of the hatches being left open. However, they do not adequately demonstrate that your safe shutdown analysis, as documented in your letters to the NRC dated July 31, 1978, October 1, 1979 and January 23, February 29, and March 4, 1980, is not compromised by the unrated hatches between the Cable Tunnels and the Turbine Building 595' Level. Therefore, you agreed to provide an additional response addressing this concern. Specifically, 10 CFR 50, Appendix R, Section III.G., is to be utilized as the criteria for determining which equipment and cabling necessary for safe shutdown could be affected by a fire that spreads from a Cable Tunnel to the Turbine Building 595' Level through the unrated personnel and equipment hatches.

We will examine these matters during a subsequent inspection.

With respect to your response regarding Unresolved Item No. 3 in Attachment B to your letter, our position on these issues has not changed and they are being evaluated by IE Headquarters. No action by you is presently required on these items.

Your cooperation with us is appreciated.

Sincerely,

C. E. Norelius, Acting Director
Division of Engineering and
Technical Inspection

cc: J. S. Abel, Director
of Nuclear Licensing
N. Kalivianakis,
Plant Superintendent

cc w/ltr dtd 4/28/81:
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Mary Jo Murray, Office of
Assistant Attorney General

RIII
[Signature]
Grobe/np
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RIII
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Baker

RIII
[Signature]
Williams

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Spessard

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