



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

JUL 7 1981

Docket No. 50-454
Docket No. 50-455

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

Gentlemen:

Thank you for your letter dated May 7, 1981, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in Inspection Reports No. 50-454/80-25; 50-455/80-23 forwarded by our letter dated April 17, 1981.

The information in your response to these items is appropriate with the exception of Items 2a and 3b, and your corrective actions will be reviewed during a subsequent inspection.

Regarding Item 2a, your corrective actions are acceptable; however, we disagree with your position and still perceive this matter as an item of noncompliance on the basis of the NRC position that the referenced codes and requirements preclude the bundling of the subject cables in air. This NRC interpretation of the requirement will continue to be used during NRC inspections and evaluations.

Regarding Item 3b, we disagree with your position and still perceive this matter as an item of noncompliance and, as such, we do not consider the actions delineated in your letter to be fully responsive. You indicate that "Due to the lack of specifics a generalized approach was required to provide engineering disposition of the nonconformities." This noncompliance was written in part because of your failure to develop specifics regarding weld quality in a timely fashion. Moreover, NRC review of the statistical methodology used to resolve these questions is not complete as delineated in our letter dated April 23, 1981, in response to your February 26, 1981, letter describing your statistical methods and findings. In summary, when considering the history and scope of the quality problems



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represented by NCR F-529, we do not believe your actions to resolve this matter were adequate and timely, as required by 10 CFR 50, Appendix B, Criterion XVI.

This matter was discussed during a telephone conversation on June 17, 1981, between Mr. C. C. Williams of this office and Mr. T. R. Tramm of your staff. We understand that you will submit a second letter to this office within thirty days of the date of this letter to respond to our concerns regarding this item. Your response should be submitted under oath or affirmation. With regard to the technical aspects of this matter, we will review the additional information concerning the statistical methodology that you intend to provide pursuant to our April 23, 1981 letter.

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
Gunner Sorensen, Site
Project Superintendent
V. I. Schlosser,
Project Manager
R. E. Querio, Station
Superintendent

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Naidu/so
6/26/81

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Gardner
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Lee
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Williams
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Hayes
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Spessard

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Norelius
7/6/81