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*DMB*

AUG 19 1982

Mr. John VanVranhen  
Assistant Attorney General  
Environmental Control Division  
188 West Randolph Street, Suite 2315  
Chicago, IL 60601

Dear Mr. VanVranhen:

This is in response to your letter to Mr. James G. Keppler dated August 12, 1982, in reference to Commonwealth Edison Company (LaSalle) Docket Nos. 50-373 and 50-374.

Enclosed for your information is a copy of an August 13, 1982, letter from Commonwealth Edison Company (CECo) to C. F. Braun and Company concerning the independent HVAC review - LaSalle County Station.

This matter will be discussed at a meeting scheduled for 1:30 p.m., August 24, 1982, in the NRC Region III Office. You are invited to this meeting.

If you have any questions on this matter, please contact me.

Sincerely,  
Original signed by  
A. Bert Davis  
A. Bert Davis  
Deputy Regional Administrator

Enclosure: As stated

- cc w/encl:
- Louis O. DelGeorge, Dir. of Nuc. Lic.
- D. L. Shamblin, Site Constr. Supt.
- T. E. Quaka, QA Supervisor
- R. H. Holyoak, Sta. Supt.
- B. B. Stephenson, Project Mgr.
- DMB/Document Control Desk (RIDS)
- Resident Inspector, RIII
- Karen Borgstadt, Office of Assistant Attorney General
- T. Devine, GAP
- E. Gogol, Citizens Against Nuclear Power
- B. Rorem, Illinois Friends of the Earth
- bcc w/encl:
- H. Denton, NRR
- D. Eisenhut, NRR
- T. Novak, NRR
- A. Bournia, NRR
- R. Spessard, RIII
- C. Norelius, RIII

RIII	RIII	RIII	RIII
<i>D</i> Davis/s" 8/19/82	<i>D</i> for Keppler 8/19	<i>[Signature]</i> Norelius 8/19	<i>[Signature]</i> Spessard 8/19

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

August 13, 1982

C.F. Braun & Co.  
Power Division  
1000 S. Fremont Avenue  
Alhambra, California 91802

Attn: -Mr. George Boddeker

Subject: Independent HVAC Review - LaSalle County Station

Dear Mr. Boddeker:

The United States Nuclear Regulatory Commission has requested that we have an independent HVAC review performed at our LaSalle County Station. Attachment A contains the special technical requirements by which the review must be performed. In general, however, it is intended that you verify that the HVAC installation is in accordance with the design.

You should provide us with a documented write-up outlining the plan by which you would perform this review. This plan should discuss your organization, qualifications, resumes of personnel, and any procedures and plans you would intend to use. I call your attention to the section of Attachment A concerning the independence of review. Your review should be performed with the guidance outlined therein, but you should feel free to suggest substitute forms of a similar nature that C.F. Braun may have previously used.

LaSalle County Station Unit #1 is currently scheduled to complete 50% power testing about September 15, 1982. This schedule may change based on testing progress; however, we request you to supply adequate support to this effort to provide a report by September 15, 1982 that can be forwarded to the NRC. All submittals would be provided to Commonwealth Edison Company for direct forwarding to the NRC.

BRS/dmb/1891L

cc: J.J. Maley  
B.B. Stephenson  
T.E. Watts  
B. Lee, Jr.  
C. Reed  
L.O. DelGeorge  
C.W. Schroeder  
R.E. VanDerway  
J.A. Harper  
R.J. Mazza - S&L  
D.C. Haan - S&L  
A.M. DeFusco - C.F. Braun  
A.J. Kempiak - C.F. Braun

*B. R. Shelton 8/16*

B.R. Shelton  
LaSalle County Station  
Project Engineering Manager

LASALLE COUNTY STATION  
INDEPENDENT HVAC SYSTEMS REVIEW

I. INTRODUCTION

At the request of the Nuclear Regulatory Commission (NRC) staff, Commonwealth Edison Company (CECo) is to obtain the services of an outside consultant to conduct an independent review of the safety-related and seismically supported Heating, Ventilating and Air Conditioning (HVAC) systems at LaSalle. The consultant will verify that the HVAC installation is in accordance with the design as described in Mr. C. Reed's August 4, 1982 letter to Mr. H. Denton (Exhibit 1).

II. SCOPE OF WORK

The independent reviewer will review all seven LaSalle safety-related HVAC systems.

- Control Room HVAC System (System Identification Code VC)
- Auxiliary Electric Equipment Room HVAC System (VE)
- Diesel-Generator Room Ventilation System (VD)
- CSCS Equipment Area Cooling System (VY)
- Switch Gear Rooms Ventilation Systems (VX), except for the recirculation duct in the Auxiliary Building HVAC Equipment Room.

II. SCOPE OF WORK (continued)

- Portions of the Reactor Building Ventilation System (VR): The following parts of the reactor building ventilation system are safety-related:
  - Supply air duct between and including the secondary containment isolation dampers and the duct penetration of the secondary containment boundary.
  - Exhaust air duct between and including secondary containment isolation dampers, and the duct penetration of the secondary containment boundary.
- Those portions of the Standby Gas Treatment System SGTS (VG) installed by the Zack Co.

The independent reviewer will review the supports for all three non-safety-related but seismically supported systems:

- Primary Containment Ventilation System (VP)
- Primary Containment Purge System (VQ)
- Reactor Building Ventilating System (VR)

II. SCOPE OF WORK (continued)

The reviewer shall compare the Zack HVAC installation to the S&L design, review design changes, material, and testing done in the field up through the construction testing and whatever other aspects of these systems he deems necessary to:

"Verify that the HVAC installation is in accordance with the design. This will include, but not be limited to a review of the materials installed, the field and shop welding on supports and ductwork, the operability of associated mechanical equipment, and significant design changes. The reviewer will be directed to independently verify the reliability and adequacy of existing material, structural and field testing already performed; and determine any additional testing or changes necessary to reach the conclusion that the HVAC system fulfills its safety function."

III. GENERAL

The submittal should address the Quality Assurance and Quality Control Plan that will be used to conduct the review.

All reviews should be done by appropriate procedures.

All personnel should be qualified for the job they are required to perform. Suitable documentation should be available to demonstrate their qualification.

IV. INDEPENDENCE

Edison will make available to the independent reviewer all documents requested by the independent reviewer needed to perform this review. Any reports concerning this review shall be sent to CECO who will in turn concurrently distribute the reports, unedited, to the NRC, S&L and internally within CECO. Prior review or editorial control of the written report by any of these parties is not permitted.

Any and all potential findings, shall be submitted in a timely manner to an internal finding review committee within the independent review organization composed of senior technical personnel with broad experience in technical management. This internal committee is to determine if the potential finding is accurate and has the potential for a safety concern. If the committee determines that the potential finding is accurate, but is not a safety concern, it shall be properly documented, and submitted to Edison and dispositioned. Dispositioning may involve field correction, additional analyses or both, to ensure that required design margins are maintained.

IV. INDEPENDENCE (continued)

If the finding is a potential safety concern, a second level internal committee will review those findings expeditiously and if the concern remains will notify Commonwealth Edison immediately. Commonwealth Edison will properly document and disposition such findings (including taking proper action in accordance with the technical specifications), and notify the NRC.

The individuals involved in this review shall complete Exhibit 2 and shall be free of substantive interest in Commonwealth Edison Company or Zack. Examples of substantive interest are:

1. For full time personnel: any work experience in design, construction or quality assurance of the LaSalle County Station, with Commonwealth Edison Company, or with the Zack Co. currently or within the past five years.
2. For short term personnel: currently active on any other LaSalle County Station, Commonwealth Edison, or Zack Company work.

NOTE: No single short term person shall exceed 20 hours per week and the cumulative effort of all such personnel shall not exceed 10% of the total project effort.

IV. INDEPENDENCE (continued)

3. An immediate family member is employed by Commonwealth Edison or Zack Company or is engaged directly or indirectly in the design or construction of the LaSalle County Station.
  
4. A cumulative ownership and creditor interest in Commonwealth Edison or Zack Company which exceeds 5% of their gross family annual income.



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

August 4, 1982

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: LaSalle County Station Units 1 and 2  
Resolution of HVAC Concerns  
NRC Docket Nos. 50-373/374

Dear Mr. Denton:

Commonwealth Edison has taken steps to resolve the quality assurance documentation deficiencies of the heating, ventilating and air conditioning (HVAC) system installed by the Zack Company at our LaSalle County Nuclear Power Plant throughout the course of the project. Nonconformance reports (NCR'S) issued by Zack have been reviewed and dispositioned by our engineering department and the architect-engineer, Sargent and Lundy. Also extensive field inspections have been conducted by an independent testing agency, Conam. Additionally, materials have been tested in the field and verified they met applicable material specifications. Based on these investigations, Commonwealth Edison is confident that the HVAC system as installed can perform its design safety function.

However, to add another level of assurance, Edison will have an independent review of the safety-related portion of the HVAC system performed by consultants with expertise in HVAC system design, installation and operation. The following general scope has been developed for the review:

1. Verify that the HVAC installation is in accordance with the design. This will include, but not be limited to a review of the materials installed, the field and shop welding on supports and ductwork, the operability of associated mechanical equipment, and significant design changes. The reviewer will be directed to independently verify the reliability and adequacy of existing material, structural and field testing already performed; and determine any additional testing or changes necessary to reach the conclusion that the HVAC system fulfills its safety function.
2. Notify Commonwealth Edison immediately if a safety concern is discovered.

A more detailed scope will be developed after discussions with the consultants and a report of their review will be submitted to the NRC by September 15, 1982. The consultants review will not be constrained by operational considerations.

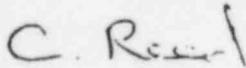
Page Two  
August 4, 1982

In the event this verification program identifies any significant deficiencies which would prevent the effected portion(s) of the HVAC system from fulfilling its safety-function, remedial action will be taken immediately in satisfaction of applicable technical specification requirements to restore adequate margin and assure the system is operable. Operation beyond 50% power will not proceed until this assessment and any required remedial action has been completed.

To the extent deficiencies of lesser significance are identified, they will be documented and reviewed with the NRC Staff and remedial action, if necessary, completed on a schedule agreed upon with the NRC Staff.

If there are any questions in this matter, please contact this office.

Very truly yours,



Cordell Reed  
Vice President

cc: Mr. James G. Keppler

LaSalle County Station  
Independent Design Review Agreement

I \_\_\_\_\_ (print or type name) \_\_\_\_\_

hereby agree that:

1. I will treat all information revealed to me in the course of my work on this project as confidential and will not disclose it to others not involved in the project except as directed by the Project Manager.
2. If I identify what I believe to be a potential finding having the potential for a significant safety impact, I will immediately notify the Project Manager for further evaluation.
3. I will notify the Project Manager if during the term of this project I, or any member of my immediate family (parents, spouse, children and grandchildren) acquire any financial interest in Commonwealth Edison or Zack Company.

\_\_\_\_\_  
Signature

.....  
\_\_\_\_\_  
Date