



Commonwealth Edison

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August 31, 1982

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

Subject: LaSalle County Station Units 1 and 2
Zack Company Weld Records
10 CFR 50.55(e) Interim Report 82-07
NRC Docket Nos. 50-373 and 50-374

References (a): C. W. Schroeder letter to A. Schwencer
dated August 11, 1982, "Documentation
of HVAC Information Presented During
Meetings of August 2-4, 1982."

(b): License NPF-11, Amendment 4 dated
August 13, 1982, Condition 2.C.(33).(b).

Dear Mr. Keppler:

The purpose of this letter is to provide an interim report
on Zack Company Weld Records in accordance with the provisions of 10
CFR 50.55(e).

Description of Deficiency

The Nuclear Regulatory Commission was notified by Commonwealth
Edison Company on August 1, 1982, of a possible discrepancy between
the shop welder of record and the shop welder who may have actually
performed the welding on certain safety-related HVAC ductwork and
hangers. This notification was made after the Zack Company advised
Commonwealth Edison Company (CECo) on July 29, 1982 of their intent
to report a Part 21 on this subject. During the July 30, 1982 to
August 2, 1982 period, CECO Quality Assurance Department with assis-
tance from Sargent & Lundy Engineers, confirmed discrepancies exist
in the documentation records of the shop welder of record on certain
Unit #1 and #2 safety-related HVAC ductwork and hangers. The review
results indicated certain shop welding may have been done by
unqualified welders. The results of this review are documented as
part of Reference (a).

Corrective Action

The approach to resolving the problem is to: 1) Substantiate
the discrepant shop welding records by additional auxiliary records
(i.e. payroll, shipping notices, etc.); 2) To inspect in the field,
the shop welds done by apparent unqualified welders, or; 3) To
confirm the existing shop weld quality and strength by destructive
testing. Additionally, an independent review is being conducted by
C. F. Braun Company in accordance with the requirements of Reference
(b). The results of this review will be utilized in the resolution
of this issue.

The status of the proposed resolution to date is as follows:

1. Discrepant shop welding records have been segregated into those applicable to Unit #1 and those not applicable to Unit #1. Shop welding records which may indicate unqualified welders have been identified for those applicable to Unit #1. This task remains to be completed for those records not applicable to Unit #1.
2. A sample review has been completed of other similar shop welding records which were thought by the Zack Company not to contain discrepancies. The sample review revealed no instances of documentation discrepancies.
3. A certain number of the shop welding records applicable to Unit #1 involve HVAC hangers. As a result of previous stop work actions at the LaSalle County Site, the possibility existed that the questionable hanger and shop welds may have been reinspected and repaired in the field. Records indicated that all questionable HVAC shop hanger welds had been reinspected by Zack Q.C. in the field and a certain portion had been independently inspected by ConAm Inspection. Additional surveillances recently conducted by CECO Quality Assurance and ConAm reverified the above weld inspections as acceptable. Thus, even if the above HVAC shop hanger welds were made by unqualified welders, they had been inspected and deemed acceptable.
4. The balance of the shop welding records applicable to Unit #1 involve HVAC duct pieces. A visual inspection of 69 duct pieces (2270 welds) showed approximately 7.4% of the shop welds did not meet procedure visual acceptance criteria. After evaluation by Sargent & Lundy Engineers, a number of the visually rejected shop welds were repaired. Also, the installed condition of remaining accessible ductwork from the suspect welding records have been forwarded to Sargent & Lundy for evaluation.
5. Samples of visually rejected duct shop welds have been destructively tested. Preliminary results indicate that in no cases did the visually rejected shop welds fail. In all cases the sheet metal or angle stiffening failed. A report is being prepared which will finalize testing results. Once the final testing results are evaluated and conclusions drawn, a decision will be made whether to conduct further visual inspections on HVAC duct shop welding.

The primary effort to date has been to technically show that the discrepant welding records do not affect the Unit #1. Thus very little resolution work has been completed on Unit #2. This is the main reason the final report will be delayed. A secondary reason is part of the final resolution involves the completion of C. F. Braun's independent investigation of HVAC work.

J. G. Keppler

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All Unit #1 corrective action will be completed commensurate with any necessary corrective actions resulting from the C. F. Braun's independent review in accordance with Reference (b). Unit #2 corrective actions will be completed by fuel load. A final report should be submitted by December 31, 1982.

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

Very truly yours,

C. W. Schroeder 8/31/82

C. W. Schroeder
Nuclear Licensing Administrator

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cc: Director of Inspection and
Enforcement
Washington, D.C.
Mr. Tom Novak, NRR
NRR Resident Inspector - LSCS

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