



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

August 17, 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: Braidwood Station Units 1 and 2
I&E Inspection Report Nos.
50-456/82-03 and 50-457/82-03

Reference (a): July 16, 1982, letter from
 C. E. Norelius to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of a special safety inspection conducted by Mr. D. H. Danielson and other staff members of your office on May 24-28, and June 1-4, 1982, of activities at Braidwood Station. During that inspection it was determined that certain activities were not in compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address further questions regarding this matter to this office to this address.

Very truly yours,

L. O. DelGeorge
 Nuclear Licensing Administrator

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Attachment

SUBSCRIBED and SWORN to
 before me this 17th day
 of August, 1982

Rosalie A. Pienta
 Notary Public

ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

VIOLATION 1

1. 10 CFR 50, Appendix B, Criterion V states in part, "Activities affecting quality shall be prescribed....and shall be accomplished in accordance with these instructions, procedures or drawings."

The licensee's Topical Report, CE-1-A, Revision 20, Section 5 states in part, "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, and specifications, or checklists."...."Activities affecting quality are required by documented instructions, procedures or drawings."

Contrary to the above, the following activities were not accomplished according to procedures or instructions:

- a. On May 27, 1982, it was identified that the Phillips, Getschow Co. Quality Assurance Manager had not prepared a training requirement sheet for the Braidwood site during the first and second quarters of 1982. This is contrary to Phillips, Getschow Co. Quality Assurance Procedure QAP-105A.
- b. On May 28, 1982, it was identified that Phillips, Getschow Co. was not stamping and marking affected documents to annotate applicable ECN's. This is contrary to Phillips, Getschow Co. Construction Procedure PGCP-7.
- c. On June 1, 1982, it was identified that weld stub barrels in the auxiliary, containment and containment air lock areas had abundant amounts of unbent weld rods, as well as weld stub barrels at Cribs #3 and #4 not being secured or welded shut. A stub barrel in the Unit 1 air lock was also noted to be unlocked. This is contrary to Phillips, Getschow Co. Quality Control Procedure QCP B.8.
- d. On June 2, 1982, it was identified that a L. K. Comstock and Company, Inc. portable weld rod oven was not plugged in as required by L. K. Comstock and Company, Inc. Procedure 4.3.10.

This is a Severity Level IV violation (Supplement II).

Item 1a

Corrective Action Taken and Results Achieved

The Phillips, Getschow Co. annual training plan for Braidwood was revised to cover the first and second quarters of 1982.

Corrective Action Taken to Avoid Further Noncompliance

The quarterly training requirement has been revised to an annual requirement.

Date When Full Compliance Will Be Achieved

August 9, 1982.

Item 1b

Corrective Action Taken and Results Achieved

ECN's relating to the drawings in question (M-919 series) were immediately checked to see that the drawings had been stamped.

Corrective Action Taken to Avoid Further Noncompliance

Contractor personnel responsible for document control were given special training on the PGCP-7 procedure. A complete check of documents pertaining to PGCP-7 has been completed. Performance in this area will be monitored by Commonwealth Edison through audits and surveillances.

Date By Which Full Compliance Will Be Achieved

August 9, 1982. Monitoring of future performance will continue as required.

Item 1c

Corrective Action Taken and Results Achieved

All welders were reinstructed regarding the provisions of QCPB.8 relating to rod disposal.

Corrective Action Taken to Avoid Further Noncompliance

More barrels have been added in the building for easier access to disposal. Signs have been put on the barrels instructing personnel to use the barrels only for weld rod and to bend all rod before disposal. Provisions have been made for locking the tops of the barrels.

Date When Full Compliance Will Be Achieved

August 9, 1982.

Item 1d

Corrective Action Taken and Results Achieved

The weld rod in the unplugged portable rod oven was immediately discarded and the rod oven was returned to the tool crib. The welder responsible for this portable oven had been absent because of illness for an extended time. The occurrence is therefore considered to be an isolated case.

Corrective Action Taken to Avoid Further Noncompliance

L. K. Comstock Q.C. is currently performing surveillance of all areas in the building for weld rod control. Surveillances are to be performed daily (weekly as a minimum). Daily surveillances were started in May and no occurrence of portable weld rod ovens being unplugged for more than four hours has been reported.

Date By Which Full Compliance Will Be Achieved

August 9, 1982.

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VIOLATION 2

2. 10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances...."

The licensee's Topical Report, CE-1-A, Revision 20, Section 5 states in part, "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, and specifications, or checklists." "Activities affecting quality are required by the Edison quality program to be prescribed by documented instructions, procedures or drawings."

Contrary to the above, as of May 28, 1982, the following activities were not controlled by documented procedures or instructions:

- a. L. K. Comstock and Company, Inc. Procedure 4.8.1 did not contain the requirement to verify the conduit plugs or caps had been installed in accordance with project standards.
- b. L. K. Comstock and Company, Inc. Procedures 4.3.8 and 4.8.8 did not address Class 1E electrical cable rework.

This is a Severity Level IV violation (Supplement II).

Item 2a

Corrective Action Taken and Results Achieved

No missing conduit caps were identified.

Note: The Inspection Report on page 48 contains an inappropriate reference to Procedure 4.8.19 in the discussion of this violation. This procedure was established to provide acceptance criteria for the protection of installed Class I cables exposed to construction activities. Once cables have been installed any requirement for inspection of conduit caps is meaningless.

Corrective Action Taken to Prevent Further Noncompliance

L. K. Comstock has revised their procedures 4.8.1 and 4.3.1 to reflect the intended purpose of S&L Standard EB-146 regarding caps for conduit installed without cable pulled.

Date When Full Compliance Will Be Achieved

The revised Comstock procedures have been approved for interim use pending completion of a review by S&L. Final acceptance is expected by August 31, 1982. Both procedures were implemented as of August 9, 1982.

Item 2b

Corrective Action Taken and Results Achieved

To date no cables have been reworked in a manner that could cause damage to the cable being pulled back or the remaining cables in the raceway.

Corrective Action Taken to Prevent Further Noncompliance

L. K. Comstock procedure 4.3.8 and 4.8.8 have been revised to address reworking of cable.

Date When Full Compliance Will Be Achieved

Comstock Procedure 4.3.8 (Cable Installation) has been revised and approved for interim use pending review by S&L. Final approval is expected by August 31, 1982. Both procedures were implemented as of August 9, 1982.