



Commonwealth Edison

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

December 2, 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
Response to Inspection Report Nos.
50-373/82-46 and 50-374/82-19
NRC Docket Nos. 50-373 and 50-374

Reference (a): W. S. Little letter to Cordell Reed
dated November 8, 1982.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. J. Hopkins, R. Lanksbury, F. Maura, and D. Robinson on September 10, 18, and October 2, 5-8, and 18, 1982, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in non-compliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

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 upon my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

L. O. DelGeorge
Director of Nuclear Licensing

CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

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DEC. 3. 1982

ATTACHMENT

Item of Noncompliance

As a result of the inspection conducted on September 10, 18, October 2, 5-8, and 18, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified:

10 CFR 50, Appendix B, Criterion V states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Morrison Construction Company Standard Operating Procedure PC-2, Welding Materials Control Procedure, Revision 8, dated February 1982, Paragraph 8.9 states, "All covered electrodes other than EXX10 shall be maintained in portable rod ovens. EXX10 electrodes shall be maintained in rod buckets. Filler wire shall be maintained in filler wire tubes. Welding material containers shall be given to Craft personnel upon presentation of employee numbers. All portable rod heaters and filler wire tubes shall be returned to a Rod Issue Room before the end of each shift.

Contrary to the above, on October 6, 1982, the inspector and two licensee individuals while on an inspection near structural beam R-20, at elevation 687, noticed a rod bucket belonging to the Morrison Construction Company which contained approximately one dozen 7018 weld electrodes.

Corrective Action Taken and Results Achieved

Morrison Construction Company (MCCo) Standard Operating Procedure PC-2, Welding Materials Control Procedure, Sections 8.9 and 8.10 have been reworded to avoid conflicting statements within the procedure. In essence, covered electrodes, other than EXX10 electrodes shall be issued in a portable rod oven. Portable rod ovens containing covered electrodes shall remain energized when a power source is available. When a power source is not available or when covered electrodes are removed from an energized or de-energized portable rod oven, specific time limits for types of covered electrodes apply.

Corrective Action Taken to Avoid Further Noncompliance

Commonwealth Edison Company believes that MCo procedure PC-2, Revision 8, dated February, 1982, sections 8.8, 8.9, and 8.10 did allow the cited practice. It should be noted that the subject weld rod material was always in a controlled condition. As a measure to avoid future misinterpretation, PC-2 was revised to more clearly state the ongoing field practice. Consequently, no further corrective action is required.

Date of Full Compliance

Full compliance has been achieved.

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