



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

7

SEP 1 1982

MEMORANDUM FOR: Thomas M. Novak, Assistant Director for Licensing, Division
of Licensing, NRR

FROM: L. S. Rubenstein, Assistant Director for Core and Plant
Systems, Division of Systems Integration, NRR

SUBJECT: REVIEW OF LASALLE COUNTY STATION TECHNICAL PROPOSAL FOR
INDEPENDENT HVAC SYSTEMS REVIEW

We have reviewed the technical proposal (Revision 1) for an independent review of the LaSalle HVAC systems which was submitted to the staff by Commonwealth Edison (CECo) in their letter dated August 27, 1982. The Auxiliary Systems Branch has the lead review responsibility for this topic. Additional reviews of the program were performed by the Mechanical Engineering Branch and Materials Engineering Branch. Their evaluations are attached to this memorandum and have been incorporated. As a result of the evaluation performed, we have the following observations and thoughts.

C. F. Braun has been selected by CECo to perform the third party review of the LaSalle HVAC systems design. Their review will essentially consist of three parts as follows:

1. Braun will compare the architect engineers' (Sargent and Lundy) design documents for the safety related HVAC systems against the Zack Co. shop drawings to verify that Zack has correctly interpreted the design documents. No review of the engineering design requirements of Sargent and Lundy that went into preparation of the design documents will be performed.
2. Braun will survey the installed HVAC systems and perform a detailed inspection of portions of the systems whose failure may jeopardize the operation of safety-related equipment. In addition, Braun will compare all nonconformance reports (NCR's) against the installed systems and categorize them by type. Twenty percent of those types determined to be critical to safety will be inspected in detail to verify that the specified disposition has been correctly implemented.
3. Braun will examine the adequacy of the HVAC systems testing to verify that the results conform to the design documents.

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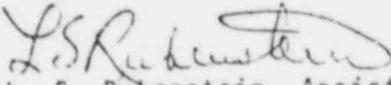
SEP 1 1982

-2-

Braun has established a two step review of observed discrepancies. The Braun site review committee will review all observations for accuracy and submit those not of safety concern to CECO for disposition. Those they determine to have potential safety significance will be forwarded to the Braun internal review committee which determines that there is a safety concern and notifies CECO who in turn notifies the NRC.

Based on our review, we believe that the proposed program will accomplish the intended independent verification of the fabrication, installation and operability of the HVAC systems. We believe that the individuals selected by Braun to perform the review have appropriate experience including experience on HVAC systems. However, we have the following comments concerning the program which we feel should be considered in order to assure accomplishing the intended task.

1. When comparing the Zack installation drawings to the Sargent and Lundy design documents, Braun should verify that any differences have been properly corrected. A specific concern that should be investigated is that in those cases where Zack did not buy materials in accordance with the Sargent and Lundy specifications, it should be verified that the materials installed are of comparable quality.
2. When examining the CECO disposition of NCRs, Braun should determine on a selective basis that the technical justification is correct. If Braun's review determines safety concerns involving significant as-built design changes, then they should evaluate these changes against the design documents.
3. All observations that the Braun site review committee submit to CECO for disposition should be acknowledged in the Braun final report.
4. All observations that the Braun internal review committee determines are safety concerns should be discussed in the Braun final report.
5. Region III should verify that the current time schedule for completion of the program (September 15, 1982) does not put an undue constraint on Braun and that the program as outlined will not be cut short based on time constraints.


L. S. Rubenstein, Assistant Director
for Core and Plant Systems
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Enclosure:
As Stated

cc w/enclosure:
See next page

SEP 1 1962

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