



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

FEB 2 1983

Docket No. 50-456
Docket No. 50-457
EA 82-136

Commonwealth Edison Company
ATTN: Mr. James J. O'Connor
President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

This refers to the routine safety inspection conducted by Mr. L. G. McGregor of this office on April 19 through July 20, 1982, and the special inspection conducted by Mr. W. J. Key on September 8-10, 1982, of activities at Braidwood Station, Units 1 and 2, authorized by NRC Construction Permits No. CPPR-132 and No. CPPR-133. The results of the routine inspection were discussed on August 31, 1982, during an enforcement conference in the Region III office between Mr. W. L. Stiede and others of your staff and Mr. A. B. Davis and others of the NRC staff. The results of the special inspection were discussed by Mr. Key with plant representatives at the conclusion of his inspection on September 10, 1982. A second enforcement conference was conducted at your request on November 19, 1982, at the Commonwealth Edison Company (CECo) corporate offices in Chicago, Illinois, between Mr. C. Reed and others of your staff and me and others of the NRC staff.

The results of the inspection indicate serious weaknesses in your management control systems as evidenced by a breakdown of your quality assurance (QA) program as it relates to the installation and installation inspection of mechanical safety-related equipment. Although a CECO site QA audit conducted in July 1980 identified the failure of your mechanical equipment contractor to implement the requirements of Appendix B of 10 CFR Part 50, your Quality Assurance Manual, and the design specifications, adequate and effective corrective action was not taken. This lack of adequate corrective action

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becomes more significant when one considers that CECo had knowledge in July 1980, June 1981 and March 1982 of a QA breakdown in this important area. In spite of this knowledge, installation of Nuclear Steam Supply System components as well as other mechanical safety-related equipment continued without benefit of procedures or quality verification. In addition, although the holder of a construction permit is required to report such deficiencies to the NRC within 24 hours and in writing within 30 days, it was not reported to the NRC until more than two years had elapsed (after your July 1980 audit).

In order to emphasize the need for CECo management to ensure implementation of an effective quality assurance program that identifies and corrects construction deficiencies, we propose to impose civil penalties for the items set forth in the Notice of Violation that is enclosed with this letter. The violations in the Notice have been categorized at the severity levels described in the General Statement of Policy and Procedure for Enforcement Actions, Appendix C of 10 CFR Part 2. The base value for each of the two Severity Level III violations is \$40,000. However, after considering that CECo had previously identified a similar breakdown in the QA program at the CECo Byron Station and failed to recognize that the same problems existed at the Braidwood Station, and the multiple occurrences of Appendix B violations identified at the Braidwood Station, the civil penalty for Violation I.A is being increased to \$60,000. After consultation with the Director of the Office of Inspection and Enforcement, I have been authorized to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalties in the cumulative amount of One Hundred Thousand Dollars.

During the November 19, 1982 enforcement conference, you described the corrective actions that you have taken to correct this problem and to prevent recurrence. These actions include the assignment of a new project manager and the re-inspection of all installed safety-related equipment. This backfit program will identify and correct installation problems and provide a complete installation record for this equipment. It appears that these actions are responsive to our concerns. We will evaluate these actions during future inspections.

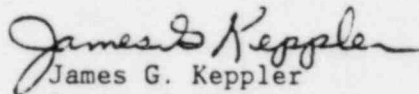
You are required to respond to this letter and should follow the instructions in the Notice when preparing your response. Your reply to this letter and the results of future inspections will be considered in determining whether further enforcement action is appropriate.

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In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,


James G. Keppler
Regional Administrator

Enclosure: Notice of Violation
and Proposed Imposition of
Civil Penalties

FEB 2 1983

cc w/encl:

PDR

NSIC

LPDR

ACRS

SECY

CA

RCDeYoung, IE

JHSniezek, IE

JAxelrad, IE

JLieberman, ELD

VStello, DED/ROGR

FIngram, PA

JGKeppler, RIII

Enforcement Coordinators

RI, RII, RIII, RJV, RV

JCummings, OIA

JFitzgerald, OI

HDenton, NRR

MWilliams, NRR

Project Manager, NRR

JCrooks, AEOD

EJordan, IE

JTaylor, IE

NRC Resident Inspector

IE/EA File

IE/ES Chron

EDO Rdg File

DCS

Michael V. Hasten, Chmn.

Commerce Commission

527 E. Capitol Ave.

Springfield, IL 62706

Neil Hartigan

Attorney General

500 S. Second Street

Springfield, IL 62701

RIII

Knop/sv

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Spessard

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WHS

Schultz

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Davis

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Keppler

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