

MAR 8 1983

Docket No. 50-456

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Vice President
Post Office Box 767
Chicago, Illinois 60690

Gentlemen:

Thank you for your letter dated January 14, 1983, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in Inspection Report No. 50-456/82-06 forwarded by our letter dated December 10, 1982.

Your response letter has been reviewed, and particular attention was given to the information presented. With respect to items 1.a.1, 1.a.2, 1.a.4, 1.b., 3.c. and 4.b. your response is acceptable and we will examine these matters during a subsequent inspection. In response to your request that violations 1.a.3, 2., 3.a., and 3.d. be withdrawn, our position remains that these items are violations. In addition, we do not consider the actions delineated in your letter for items 2.b., and 4.a. to be fully responsive as described in this letter.

Item 1.a.3 concerned the separation of Class IE cable 1SX001 from a non-safety tray. The tray documented in the item of noncompliance was in error and should be 1713C PIB and not 1689A PIE. Consequently, your response to this violation could not properly address the concern. Your response should address how Class IE cable 1SX001 which makes contact with non-safety tray 1713C PIB does not violate the requirements of IEEE 384.

The response to violation 2 does not appear to properly address the concern in the item of noncompliance. At issue is the correct interpretation of the tolerance delineated in S&L drawing 6E-0-3000A which states, "A cable entering a pan within 3 feet of a routing point marker...may not have that routing point listed in its routing even though the cable does cross the point..1." The intent of the above quote is understood to allow for variances in placing routing markers on cable trays. However, in this instance cable 1SX001 is routed from node point 1502F directly into the entire length of node 1573F which is not indicated on the cable routing card. Application of your three foot tolerance regarding routing markers in the manner outlined above would result in not documenting actual routing of the cables. The present interpretation of the routing tolerance does not appear adequate.

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The response to violation 3.a. and 3.d. does not appear to properly address the concern outlined in the item of noncompliance. The response to action taken to assure that Class 1E cables are separated from non-class 1E cables in accordance with your procedure and FSAR commitments is not satisfactory. In each of the two cases, cables exit one raceway and enter a second raceway and come in close proximity (less than specified requirements) to other redundant or non-safety cables. The commitment in your procedure was understood to encompass all these situations. In your response, please provide an engineering justification that addresses the separation between Class 1E and Non-Class 1E cables when less than twelve inches as is exhibited by the two cases described above.

Your response to item 1.c. does not appear to be entirely correct. NCR's supplied to the inspector do not appear to address the specific cables existing cable trays 11798-C2E and 11798S-K2B. In addition hold tags or other forms of identification were not evident in the immediate area as required by your QA program. However, since you state that cable grip supports are to be installed to maintain separation, this item appears acceptable. Your response will be further examined in a subsequent inspection.

Your response to item 4.a. does not completely address our concern. We acknowledge your prompt corrective action on the disposition of the cable reels since the date of the inspection. However, the cable reels had been found potentially nonconforming during a receipt inspection on October 2, 1979. Contrary to your response, your site personnel reported that reel #20BR was completely installed and 16BR was partially used, prior to resolution of this issue. As a result prompt and effective corrective action was not evident. Your QA commitments require that nonconforming items be identified, documented, tagged and segregated for disposition in a prompt manner.

Based on the above, we request that you provide a supplemental written response within 20 days of receipt of this letter to this office readdressing items 1.a.3., 3., 3.a., 3.d., and 4.a.

Your cooperation with us is appreciated.

Sincerely,

"Original signed by W. S. Little"

RS
R. L. Spessard, Director
Division of Engineering

cc w/ltr dtd 1/14/83:
Dennis L. Farrar, Director
of Nuclear Licensing

V. I. Schiosser, Project Manager

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