



Commonwealth Edison
Braidwood Nuclear Power Station
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AMB

March 2, 1984

Mr. James G. Keppler,
Regional Administrator - Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

SUBJECT: Braidwood Station Units 1 and 2
10 CFR 50.55(e) 30 Day Report
L. K. Comstock, Documentation Review
NRC Docket Nos. 50-456/457

Dear Mr. Keppler:

On January 31, 1984, the Commonwealth Edison Company Project Construction Department notified Mr. R. C. Knop of a potential deficiency reportable pursuant to 10 CFR 50.55(e) regarding the L. K. Comstock, Document Review. For tracking purposes, this deficiency was assigned Number 84-01.

This letter fulfills the thirty (30) day reporting requirements of 10 CFR 50.55(e) regarding this matter and is considered to be an interim report.

Description of Deficiency

As early as March, 1982, Commonwealth Edison Company Quality Assurance audits and the Technical Support Evaluation of September, 1982, identified deficiencies indicating the need to improve the L. K. Comstock documentation/filing system.

As a result of identified deficiencies Commonwealth Edison Company felt that improvements could be made in the areas of:

1. Timeliness of records retrievability.

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2. Better accountability of the production records which support the status of installation.
3. Reconciliation of the use of previously used outdated forms.

In October, 1982, it was determined that progress was poor in the document review. In November of 1982 the L. K. Comstock Quality Control Manager was replaced because he lacked administrative abilities. However, poor progress in the document review continued. In March, 1983, Project Construction Department held a meeting with L. K. Comstock's Regional Vice President and in April, 1983 with L. K. Comstock's Executive Vice President, Corporate Quality Assurance Manager and Regional Vice President to discuss the poor progress being made on the document review. As a result, L. K. Comstock committed to provide four (4) inspectors to complete the document review and provide a plan for completion.

The plan to complete the review was submitted to Commonwealth Edison Company for concurrence on March 9, 1983. The plan's scope and depth was to reconcile audit deficiencies of document retrievability, as well as assuring record completeness and correctness.

In June, 1983, Project Construction Department and Quality Assurance met with L. K. Comstock to discuss the status of the document review. It was determined that L. K. Comstock was not proceeding as scheduled to meet their September, 1983, completion date. As a result of the June meeting, Commonwealth Edison Company again replaced the L. K. Comstock Quality Control Manager, with intent to more adequately organize and complete the document review as projected for February 1, 1984.

The corrective measures which provide improvements to the L. K. Comstock document system were presented to the NRC (Messrs. Little, Williams and Love) on November 3, 1983 and the program was mentioned on December 20, 1983 during the Enforcement Conference.

To date L. K. Comstock is 100% complete with their review of all documents on file.

Any significant deficiencies requiring extensive rework will be reported in the final report. Also any large backlog of inspections to be performed to assure the completeness of the Quality Control record for installed items will be reported as identified.

ANALYSIS OF SAFETY IMPLICATIONS

This deficiency does not affect the safe operation of the plant. It is the our intent to assure that all safety related installations have a complete and credible record of installation and Quality Control acceptance prior to systems turnover to operation.

CORRECTIVE ACTION TO PREVENT RECURRENCE

Project Construction has authorized the use of a computerized document tracking system. This system will be used to document the status of installation and inspections.

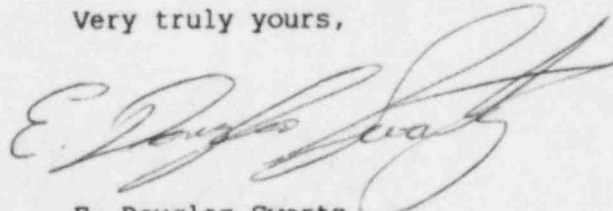
To prevent incomplete or unacceptable documents from being filed, L. K. Comstock has provided for a three (3) level review. Lead Inspectors are responsible for reviewing all documents initiated in their areas of responsibility. The Supervisor of Inspectors provides a second level management review. It's his responsibility to determine whether additional direction/clarification is needed to be given to inspectors who continue to improperly fill out reports. Finally all documents are reviewed by Document Control before they are filed.

DATE OF COMPLETION

Reconciliation of the inspection records is expected to be completed on May 1, 1984, when a final report will be issued.

Please address any additional questions concerning this matter to this office.

Very truly yours,



E. Douglas Swartz
Nuclear Licensing Administrator

cc: RIII Inspector - Braidwood
Director of Inspection and Enforcement

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