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DMB

June 26, 1984

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

Subject: Braidwood Station Units 1 and 2  
10 CFR 50.55(e) 83-07 Interim Report  
Documentation of Q.C. Verification  
NRC Docket Nos. 50-456 and 50-457

- References (a): E. D. Swartz letter to J. G. Keppler  
dated July 29, 1983.
- (b): E. D. Swartz letter to J. G. Keppler  
dated October 31, 1983.

Dear Mr. Keppler:

References (a) and (b) provided the thirty-day and interim reports concerning 10 CFR 50.55(e) Number 83-07 dealing with the lack of sufficient documentation to support Quality Control verification of piping heat number or mark number traceability at our Braidwood Station. As described in References (a) and (b), a sample inspection was to be performed to determine the extent to which material traceability was maintained by markings on the piping material or by material issuance documentation. Based on the results of that sample, an appropriate corrective action plan would be developed. The purpose of this letter is to provide a further status update in this matter.

The sample inspection program performed by Phillips-Getschow is now complete. The preliminary results were reviewed by NRC personnel as documented in the NRC Inspection Report Nos. 50-456/83-09 and 50-457/83-09. The sample inspection program identified a small number of cases in which installed piping material was not in compliance with design requirements. Additionally, a Commonwealth Edison Site QA Audit 20-83-33 dated July 15, 1983, identified a case in which installed piping material was of a code class different from that required by the design. As a result of this sample inspection program and subsequent discussions with NRC personnel, we have since developed the Piping Heat Number Material Traceability Verification (MTV) Program.

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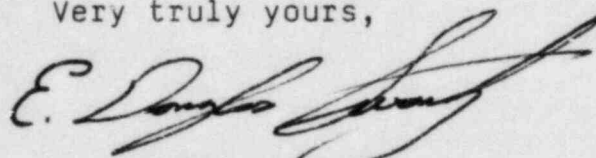
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The MTV Program includes field inspections for material markings and reviews of supporting installation documentation for material traceability. A comparison of field markings against traceable documentation will be performed to establish the validity of the existing documentation as an acceptable means of maintaining traceability. The scope of this program includes ASME small bore piping installed prior to August 31, 1983, and ASME large bore piping installed prior to November 30, 1982. (Documentation of the verification of material traceability by Q.C. personnel has been generated for piping installed subsequent to these dates.) This Program will ensure that the installed material is traceable and that the material is in accordance with the design requirements. Details of this Program are contained in Phillips-Getchow Procedure QCP B31 which is available on site for review.

Based on the results of the sample inspection, we anticipate that a limited number of piping material installations will require engineering evaluation and/or rework to ensure conformance with design requirements. A detailed report on the results of the MTV Program and the disposition of all identified discrepancies will be provided upon completion of the MTV Program. This Program is currently scheduled for completion in March 1985. Therefore, we expect to be in a position to provide the Region with a final report in April, 1985.

Please address any questions that you or your staff may have concerning this matter to this office.

Very truly yours,



E. Douglas Swartz  
Nuclear Licensing Administrator

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cc: Region III Inspector-Braidwood

Director of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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