



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

June 28, 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  
Supplemental Response to IE  
Inspection Report Nos. 50-456/83-18  
and 50-457/83-17  
NRC Docket Nos. 50-456 and 50-457

References (a): L. O. DelGeorge Letter to J. G. Keppler  
dated March 23, 1984.

(b): R. L. Spessard Letter to Cordell Reed  
dated January 27, 1984.

(c): R. L. Spessard Letter to Cordell Reed  
dated June 8, 1984.

Dear Mr. Keppler:

Reference (a) provided the Commonwealth Edison Company response to the Reference (b) Inspection Report concerning electrical issues at our Braidwood Station. A meeting was subsequently held at Region III to discuss our response, and certain agreements were reached as delineated in Reference (c). The purpose of this letter is to respond to Reference (c) and supplement our Reference (a) response as follows.

A. Commonwealth Edison Company acknowledges the fact that not all of the L. K. Comstock procedures were revised by our expected date of March 30, 1984. Since February 16, 1984, twenty-seven (27) L. K. Comstock procedures were in various stages of revision to reflect both NRC and Commonwealth Edison Company Quality Assurance commitments.

Of the twenty-seven (27) procedures, eight (8) required changes as a result of the NRC inspection. Subsequently, all eight (8) procedures were changed and approved for use. Procedures 4.8.6 (CEA Installation) and 4.8.15 (Document Verification), although not reviewed during the inspection, required minor changes to be consistent with our commitment in the March 23, 1984 response (Item 2, Example 3.B.9). Procedures 4.3.8 and 4.8.8 (Cable Pulling and

8407100270 840705  
PDR ADOCK 05000456  
Q PDR

JUL 2 1984

Inspection) were approved for use on May 14, 1984. Because of the delay in revising these two (2) procedures, on May 10, 1984 cable pulling activities were suspended. The work suspension was in effect until May 18, 1984, when Commonwealth Edison Company site Quality Assurance verified that the following activities had been completed:

1. L. K. Comstock's Procedure 4.3.8 "Cable Installation" and Procedure 4.8.8 "Cable Installation Inspection" were revised and granted on-site interim approval.
2. All applicable L. K. Comstock production and Quality Control personnel were issued the revised procedures noted in Item 1. above.
3. All applicable L. K. Comstock production and Quality Control personnel were trained in the revised procedures. Commonwealth Edison Company Quality Assurance attended the training session.

In the future when completion of commitments will not be met by the expected date, Commonwealth Edison Company will formally request an extension from the NRC and/or update our response with the latest available information. This has been and continues to be our policy.

- B. Reference (a), Enclosure No. 3, Interim Response to Unresolved Item 50-456/83-18-09; 50-457/83-17-06, stated that:

"This item is currently under review by the Commonwealth Edison Company. The review is expected to be completed by April, 1984. Based upon the results of this review and existing field conditions, appropriate corrective actions will be taken. The results will be made available for the Region's review when available."

Subsequently, a torque value of 50 ft.-lb. was provided by Westinghouse for the 1/2 inch mounting bolts on the Motor Control Centers. Although this information was not yet approved by the Architect/Engineer, it was presented to the Region personnel during our meeting and the inspection visit of March 5 through 9, 1984 (456/84-04; 457/84-04).

In lieu of a report to evaluate or analyze the existing 35 ft.-lb. torque value for the mounting of Motor Control Centers, all MCC's will be retorqued to the 50 ft.-lb. requirement.

Action to assure that correct bolt torque is applied to all Motor Control Centers is documented on Commonwealth Edison Company NCR 596.

For other equipment, Design Drawings will be revised to reflect AISC standard tightening requirements when no torque value is given.

- C. Reference (a), Enclosure No. 2, "Cordell Williams Request for Additional Information" Page 3, Item 2.a. should be amended to include the following paragraphs:

We are unable at this time to supply you with a firm schedule for the close out of open deficiencies as you have requested. However, Commonwealth Edison Company has taken the following actions to reduce the number of open deficiencies to a satisfactory level.

1. Provide additional craft and quality personnel to resolve open reports.
2. Request L. K. Comstock Regional and Corporate Quality Assurance/Quality Control Management to assist in the planning and implementation of reducing all open reports.

L. K. Comstock currently has approximately 25% of their craft personnel working on the resolution of open deficiencies. In addition to the increased quality control forces at L. K. Comstock (discussed with the NRC in late May, 1984), Commonwealth Edison Company has authorized four (4) Sargent and Lundy AWS Certified Welding Inspectors or AWS Certified Associate Welding Inspectors to perform visual inspections as L. K. Comstock quality control inspectors until the number of deficiencies have been reduced.

Of the total number of open ICR's, 32% (415 reports) are open pending Quality Control closeout. Of the total number of open NCR's, only 6% (74 reports) are open pending Quality Control closeout.

The impact of the above actions have yet to be totally realized, and we are unable to project a schedule as a result. However, Project Construction Department is confident that the present number of Quality Inspectors and Craft Personnel is adequate to perform timely inspections, repairs and reduce the number of open deficiencies. In order to assure timely resolution, Commonwealth Edison Company Project Construction Department and Quality Assurance will continue to monitor progress until the number of open deficiencies has satisfactorily been reduced.

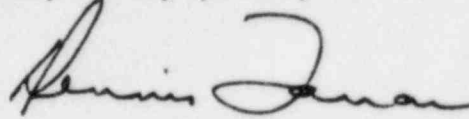
J. G. Keppler

- 4 -

June 28, 1984

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "Dennis J. Farrar".

D. L. Farrar  
Director of Nuclear Licensing

lm

cc: RIII Inspector - Braidwood

8897N