



**Commonwealth Edison Co.**

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Telephone 815/458-2801

*DMB*

August 30, 1984

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

PRINCIPAL STAFF	
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Subject: Braidwood Station Units 1 & 2  
Braidwood Construction Assessment Program (BCAP)  
NRC Docket Nos. 50-456 and 50-457

References (a): J. J. O'Connor letter to J. G. Keppler dated June 22, 1984  
(b): J. G. Keppler letter to J. J. O'Connor dated July 27, 1984

Dear Mr. Keppler:

Reference (a) provided you with the Braidwood Construction Assessment Program (BCAP). The purpose of this letter is to confirm our plans for the first monthly BCAP status meeting and to provide you with the results of our review of Reference (b).

Commonwealth Edison Company has arranged for the first periodic BCAP status meeting to be held at the Mazon EOF, which is located on Illinois Route 47 just North of Mazon, Illinois. This meeting is scheduled for 9:00 a.m. on September 6, 1984, which is the first Thursday of the month, as suggested by your letter. The meeting will be among Commonwealth Edison Company, the Independent Expert Overview Group, and the NRC, and will be open to the public.

Your letter (Reference b) provided specific BCAP Comments, General Comments, and a suggested Protocol Governing Communications Between Commonwealth Edison Company and Evaluation Research Corporation (ERC) in the Braidwood Construction Assessment Program. We have reviewed all of your comments and suggestions in detail and have given them serious consideration. The depth and detail of your review and comments is appreciated.

Attachments A, B, and C to this letter provide item by item discussion response to your BCAP Comments, General Comments, and Protocol. We believe that this discussion is responsive to Reference (b).

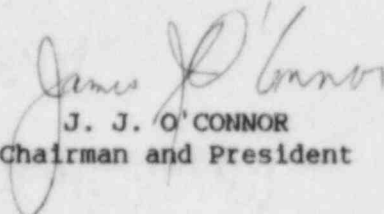
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Reference (b) provided Region III approval of the basic BCAP subject to incorporation of the NRC comments. Based upon our enclosed response to your comments we are proceeding with implementation of BCAP and assume your continued approval of this program. If there are any questions on this subject, please contact me immediately.

Very truly yours,

  
J. J. O'CONNOR  
Chairman and President

TJM/dlt

Attachments

cc: NRC Resident Inspector - Braidwood

Response to NRC BCAP Comments [Enclosure 1, page 1]

Commonwealth Edison Company has carefully reviewed the NRC comments to specific sections of the BCAP. The following provides responses and clarifications for each comment. In each case, Edison believes that no change to the existing BCAP Document is warranted with the exception of resolution of comment II-5.

NRC Comment: Page I-2

The BCAP should identify the approximate percentage of the total effort represented by each element.

CECo Response:

The efforts of BCAP are identified in the table below. This table does not include the extensive support provided by CECo Project Construction Department, the various site contractors, Sargent & Lundy, or the effort represented by the ERC as the Independent Expert Overview Group.

A. Estimated BCAP Manhours

	<u>ELEMENT</u>	<u>PEAK MANPOWER</u>	<u>MANHOURS ESTIMATED</u>	<u>% of TOTAL BCAP MANHOURS</u>
1.	CSR	66	48,000	75%
2.	RPSR	10	8,300	13%
3.	RSCAP	<u>9</u>	<u>7,700</u>	<u>12%</u>
4.	Total =	85	64,000	100%

B. Estimated BCAP Q.A. Manhours

		<u>PEAK MANPOWER</u>	<u>MANPOWER ESTIMATED</u>	<u>% of TOTAL BCAP QA MANHOURS</u>
1.	BCAP Q.A. OVERVIEW	12	15,000	71%
2.	BCAP Q.A. OVERINSPECTION	<u>9</u>	<u>6,000</u>	<u>29%</u>
3.	Total	21	21,000	100%

NRC Comment: Page II-1

The BCAP should identify the approximate distribution percentage between Units 1 and 2. This percentage should be in the range of 60-70 percent for Unit 1 and 30-40 percent for Unit 2.

CECo Response:

The efforts of RPSR and RSCAP are equally applicable to both units and the common areas of the plant. Within the CSR, reinspections and reviews of documentation supporting hardware will be performed for items in each unit and in common areas. The selection of items for inclusion in the samples is such that the samples span the construction work throughout the construction history of the plant [BCAP p.II-4]. Therefore, the proportion of work for each construction category that will be reinspected by the CSR will be similar to the proportion of work for this category that is completed in each unit. It is not feasible prior to CSR sample selection to accurately predict the distribution of work subject to CSR reinspection between the two units.

However, in light of the current estimates of the overall completion of each unit, it is anticipated that the average of the distribution between units, over all construction categories, will be in reasonable conformance with those ranges specified in the NRC comments. This distribution between actual units will be calculated for each construction category as the samples are identified and will be available for NRC review. The selection of samples for CSR review is governed by BCAP implementing procedures.

NRC Comment: Page II-1: (identified as III-1 in NRC comments)

For the population of activities already inspected because of previously identified problems, a review for completeness and accuracy of the associated documentation should be performed as would be for a CSR.

CECo Response:

Within the RSCAP, documentation associated with and supporting each existing significant corrective action program will be reviewed in a manner similar to that used by the CSR. A sample of documentation associated with each significant corrective action program will be reviewed against criteria defined in a pre-established checklist. Details of the implementation of this activity are included in BCAP implementing procedures and checklists applicable to RSCAP.

NRC Comment: Page II-2

The BCAP should clearly identify functions which do not require the use of qualified and certified personnel.

CECo Response:

All persons performing reinspections and document reviews within the CSR element will be qualified and certified as a minimum as Level II in accordance with REG. Guide 1.58, Rev. 1 (ANSI N45.2.6 1978). All other personnel will have qualifications commensurate with their job functions and will have resumes available in the BCAP files to document their experience and qualifications. Additional details of personnel training qualification, and certification requirements are provided in BCAP implementing procedures.

NRC Comment: Page II-4

When determining the acceptability of a sample size the conclusion should be based on the percentage of the items in the sample which are found to be properly installed irrespective of the number of attribute inspection points.

CECo Response:

The selection of the sample sizes in CSR is based not on inspection attributes, but rather on "items" (ref. BCAP Policy Document p.II-4 and also Appendix A for examples of "items" as units for reinspection). The number of inspection attribute points will have no bearing on any calculations used in determining sample sizes or the acceptability of a sample or a population.



NRC Comment: Page II-5

The CSR sample expansion criteria should ensure that the increased population includes inspections of all of the attributes inspected in the original sample population.

CECo Response:

Work in a construction category is considered acceptable if no design significant discrepancy is found in the initial sample. If a design significant discrepancy is identified in the initial sample, an additional sample will be chosen. Inspections of all attributes as inspected in the initial sample will be performed for this expansion sample. The results of this expansion sample will determine whether the initial design-significant discrepancy is an isolated case. If it is determined to be an isolated case, then no additional inspections will be performed and the discrepancy will be evaluated and dispositioned in accordance with approved project procedures governing non-conformances (NOC's). If, however, an additional design-significant discrepancy is identified in the expansion sample, then an evaluation of the discrepancies for their root cause (or causes) will be performed. If the discrepancies have similar root causes, then 100% of the items potentially affected by the root cause will be reinspected. These inspections will be of the type sufficient to identify discrepancies similar in nature to those identified in the previous samples.

If these design-significant discrepancies have unrelated root causes, then additional samples may be reinspected for all attributes initially inspected to determine if either of these discrepancies are isolated cases or are representative of a programmatic discrepancy. If these cases cannot be determined to be isolated, then 100% of the accessible items in the population will be reinspected for all initially inspected attributes.

The sample expansion criteria provided above are in response to the NRC comment and are different from what is currently stated in the BCAP document. The BCAP document will be revised to include the above stated criteria.

NRC COMMENT: Page III-3

The BCAP Director should report to the Manager of Projects.

CECo Response:

The Project Manager has overall responsibility for the successful completion of the Project. This includes not only building an acceptable plant, but also getting the plant licensed, including satisfactory and credible completion of licensing commitments which include BCAP.

By reporting to the Project Manager, the BCAP Director is on an equal level in the organization with the Superintendent of Construction, Licensing and Compliance, Startup, and Operating. This allows all personnel on-site, both Edison and contractors, to view the BCAP effort as a "Project" effort of equal importance to the other Project activities. It establishes BCAP as a significant, important activity for which the Project Manager is directly responsible, as compared to an evaluation/audit activity being performed by an "off-site" organization. To be most effective, the BCAP Task Force needs a strong interface and cooperative support from other site groups; a "line" reporting relationship direct to the Project Manager best accomplishes this.

In contrast, if the BCAP Director reports to the Manager of Projects, the BCAP effort is likely to be perceived by the on-site organizations as an outside effort, thus reducing effectiveness of the BCAP Task Force which must constantly depend on on-site support to accomplish its objectives. The Manager of Projects on the other hand can not be available on site for reason of his other commitments and thus can not provide day-to-day involvement and organizational support of the program.

To provide an added measure of assurance in the reliability of the results of the BCAP, the BCAP effort is being overviewed by the Independent Expert Overview Group, which reports to the Manager of Projects. This group is involved in reviewing all plans, procedures and the day-to-day operation of the BCAP organization. In short, this group will conduct a comprehensive third party overview of the BCAP. The results of the overview will be submitted in periodic reports to the Manager of Projects and the NRC.

All BCAP activities will be exceptionally well documented and open to review. Activities are controlled through the use of BCAP specific plans, procedures, instructions and checklists. The procedures being implemented and documentation being maintained is, in general, more detailed and formalized than other Project activities.

Overviewing the implementation effort within Commonwealth Edison will be a separate and unique Site Quality Assurance Group. This group, in general, is not involved in the mainstream of project engineering, construction and testing activities.

CECo Response to: Page III-3 (Cont'd)

In summary, the formality of the BCAP effort, overview by a separate Site Quality Assurance Group, and third party overview by the Independent Expert Overview Group reporting to the Manager of Projects, provides a high level of assurance that BCAP activities will not be influenced or affected by other Project priorities. At the same time, by reporting to the Project Manager the group will be viewed as responsible for an effort which has equal importance with other site activities, and which commands the same support and close interface as other site groups. Finally, with the monthly formal reporting to the NRC, at a public meeting, and the direct involvement of the NRC in overseeing day-to-day BCAP activities, comes the added assurance that the effort being carried out will have a high measure of credibility.

NRC Comment: Page IV-2

The BCAP Director should provide monthly reports to CECo management and the NRC simultaneously.

CECo Response:

In the future, the monthly report prepared by the BCAP Director will be issued simultaneously to CECo management and the NRC. The BCAP procedure governing the monthly report preparation and issuance will be revised to reflect this requirement.

NRC Comment: Page V-1

The Independent Expert Overview Groups (ERC) should perform field inspections, audits and surveillances of installed equipment, hardware and inprocess inspections, and review BCAP procedures to determine if the BCAP is properly identifying problems.

CECo Response:

As previously planned, the ERC will perform these activities as described.



NRC Comment: Page V-1

The Independent Expert Overview Group should issue monthly reports with copies to the President and Chairman of the Board of Commonwealth Edison, and the NRC in accordance with the "Protocol Governing Communications".

CECo Response:

The ERC will adopt this suggestion as stated.

NRC Comment: Page V-1

ERC should review some observations to ensure that appropriate ones are being documented as discrepancies (NCR's).

CECo Response:

As previously planned, the ERC will perform this review.

NRC Comment: Page A-3

Large Bore Piping Snubbers should also be inspected for installation welds and/or bolting.

CECo Response:

As previously planned, these attributes will be inspected.

Response to NRC General Comments [Enclosure 1, page 2]

Commonwealth Edison has carefully considered the NRC General Comments and values their constructive suggestions toward further assuring that the Braidwood Station meets construction specifications. Some of these comments suggest actions that are already contemplated within the scope of BCAP. Other comments suggest reviews that, while related to BCAP activities, may also be accomplished outside the scope of BCAP but within other already-planned reviews. Thus, Commonwealth Edison believes it has addressed all comments in a responsive manner, without the need for change to the BCAP Program.

Commonwealth Edison is undertaking BCAP as a program of inspections and reviews to answer any legitimate question concerning the overall quality of construction at Braidwood. This effort is in addition to implementation of Commonwealth Edison's Quality Assurance Program. This Quality Assurance Program is being effectively implemented at Braidwood and is designed to provide reasonable assurance that construction quality at Braidwood conforms to regulatory requirements. Any concerns or problems which the NRC has found in its inspections and enforcement activities, or which may be found in the future, shall be addressed by the Commonwealth Edison Quality Assurance Program.

In this context, the BCAP was developed as a program of limited scope. The objectives of BCAP are to assure (a) that there are no programmatic design-significant problems in the construction of Braidwood which have not been identified and addressed; (b) that the on-site contractors' procedures governing on-going safety-related construction and quality assurance activities address all applicable design and regulatory requirements; and (c) that where past construction problems have been identified which resulted in significant corrective actions, the corrective actions have been adequately implemented. Those non-conforming conditions which have already been identified by the Commonwealth Edison Quality Assurance Program (e.g., deficiencies documented in NCR's) will continue to be tracked and resolved through normal program channels rather than be subject to additional review by the BCAP.

It is in this context that the following Commonwealth Edison response to the NRC General Comments is offered.

GENERAL COMMENTS

NRC Comment #1:

The CSR should include a review of radiographs for field welds and shop welds.

CECo Response:

Within the CSR, the documentation supporting a sample of items within each construction category will be reviewed. To this extent, the CSR will assure that the Code- and specification-required NDE for field welds was performed and that the appropriate documentation supporting the performance of the NDE exists and is complete and accurate. A reinterpretation of radiographs will not be performed as part of the BCAP scope. It is not intended that BCAP review the detailed welding or NDE records of shop fabricated components.

We believe that the recent four-week inspection by the NRC Mobile NDE Van at Braidwood (Inspection Report 50-456/84-05 and 50-457/84-05) and the corrective actions which will be implemented in response to this inspection provide sufficient additional assurance of the adequacy of radiographs.

NRC Comment #2:

The CSR should review cable tray and conduit electrical separation.

CECo Response:

The CSR element will review the electrical separation of cable tray and conduits to verify adherence to dimensions required by A/E design drawings and specifications.

Additional action outside the BCAP is described by a currently existing Sargent & Lundy Project Instruction. The program establishes walkdown areas with pre-prepared drawing packages identifying class IE and non-class IE raceways for which specified separation criteria is reviewed. The walkdown will be performed within about six (6) months prior to scheduled Fuel Load.

NRC Comment #3:

The BCAP should include a review of a sample of site procurement documents.

CECo Response:

Commonwealth Edison Company believes that conducting a comprehensive assessment audit outside of BCAP of site procurement activities is a prudent measure to ensure compliance with applicable regulations. The audit planned will include a review of compliance to existing procedures and a review of those existing procedures for inclusion of necessary regulatory requirements. The audit is intended to be broadly focused on the procurement activities necessary to ensure adherence to quality requirements. Site procurement activities include the following:

1. Initiation of material purchase requisitions by contractors and Commonwealth Edison Company personnel.
2. Procurement from approved vendors, bid evaluation, and contract award.
3. Incorporation of the applicable quality requirements into the final purchase orders.
4. Vendor audit and inspection point program.
5. Receipt inspection program and release of materials from warehousing.
6. Review of quality documentation to ensure procurement requirements are met.

The audit will be conducted by an off-site quality assurance team with expertise in procurement activities, assembled by the Commonwealth Edison Company General Office Quality Assurance Department.



NRC COMMENT #4:

The BCAP should include a review of on-site design activities.

CECo Response:

There is presently an effective program to monitor the adequacy of on-site Architect/Engineer design activities. These include:

1. An on-site CECO Field Engineering group is assigned to direct and overview the daily activities of the on-site design process.
2. An on-site CECO QA group is assigned to perform technical surveillances and audits.
3. The A/E has established a special technical monitoring program for their Braidwood on-site design group. This review is normally performed monthly by S&L teams and involves a technical review of a sampling of the work.
4. The A/E has assigned a full-time QA Coordinator to the on-site design organization.

NCR Comment #5:

The CSR should include a review of a sample of vendor supplied equipment for compliance with design.

CECo Response:

Commonwealth Edison Company believes that conducting an evaluation, outside of BCAP, of vendor supplied equipment for compliance with vendor drawings is a prudent measure. The evaluation will be conducted by a team with experience in equipment inspection.

NRC Comment #6:

The BCAP should include a review of equipment maintenance activities.

CECo Response:

The BCAP-RPSR element will include a review of contractor equipment maintenance procedures to ensure adherence to specification requirements.

Additionally, on June 13, 1984, Commonwealth Edison Company Project Construction Department drafted an action plan for enhancing contractor's construction phase mechanical and electrical equipment preventive maintenance, protection and cleanliness programs. A Task Force reporting to the Project Construction Superintendent was assigned responsibility for implementing the action plan.

The action plan activities which are either initiated or planned include the following:

1. Commonwealth Edison Company has developed a revised procedure addressing equipment preventive maintenance during the construction phase. This procedure will enhance the existing programs to adequately address the performance and verification of equipment preventive maintenance/protection activities. This procedure is currently undergoing review and approval for use. Upon approval, this procedure will be transmitted to the appropriate contractors for implementation. Each contractor will enhance its appropriate procedures. CECO will approve these procedures prior to their implementation. These contractor procedures will include appropriate QC surveillance of equipment preventive maintenance activities.
2. Training will be given to the new equipment preventive maintenance/protection procedures.
3. A program to evaluate historical contractor equipment preventive maintenance and protection activities prior to the implementation of revised procedures is being developed at this time. It is intended that this evaluation will include the following:
  - a. Identifying all applicable mechanical and electrical equipment which required preventive maintenance.

CECo Response to Item #6: (Cont'd)

- b. Review of the appropriate manufacturer's manuals to determine the necessary preventive maintenance/protection.
  - c. Ascertaining the actual prevention maintenance/protection performed based on a review of the contractor's record.
  - d. Comparison of actual vs. required preventive maintenance/protection performed to identify any disparities.
  - e. An evaluation of any identified disparities, i.e., evaluation of Pre-Op test results for acceptability of equipment or evidence of equipment degradation. This is to include resolution of any identified nonconformance.
4. A master file (possibly computerized) of all equipment contained in the preventive maintenance/protection program and the status of said equipment (i.e., in storage, installed, turned over to the Station Operating Department, etc.) is being developed within Commonwealth Edison Company Project Construction Department. The electrical equipment list is already in the process of being developed and will be completed, along with the mechanical list, during the evaluation of Step 3 above.

NRC Comment #7:

The BCAP should consider NRC inspection findings and concerns, as well as INPO findings.

CECo Response:

Within the CSR element, the BCAP will perform a review of NRC Notices of Violation (items of Noncompliance), and items reported under 10 CFR 50.55(e) at Byron and Braidwood, to determine the categories of construction within CSR to which these findings are applicable. A sample of hardware installations from these categories which are likely to be affected by these findings are selected for reinspection and document review.

All INPO findings are separately addressed and responded to by Commonwealth Edison. Our responses to the INPO findings, including corrective actions implemented, will be documented in our response to INPO. Upon issuance of the INPO Report of the Evaluation of Braidwood (restricted distribution), the results of this report will be shared with NRC Region III.

NRC COMMENT #8:

The ERC should review a sample of the implementing procedures of the Quality Assurance Overview Group.

CECo Response:

The ERC will review the BCAP Site Quality Assurance Overview Group's Plan, as well as those implementing procedures specifically written for the overview of BCAP.

NRC COMMENT #9:

The ERC should sample implementing procedures for each hardware discipline.

CECo Response:

The ERC will review each procedure for the three elements of BCAP, as well as those BCAP procedures common to the three elements and administrative procedures. Additionally, ERC will review, on a sampling basis, the detailed reinspection and document review checklists and instructions used in the CSR element. The ERC will also inspect hardware on a sampling basis.

NRC COMMENT #10:

The BCAP should include a sample of piping stress isometrics compared to the latest revision of the design drawing.

CECo Response:

The current design procedures call for Braidwood safety-related piping systems to be reconciled by the designer (Sargent & Lundy). The piping stress analysis is being compared to, and reconciled with, the actual piping installation, as well as the latest design. This "piping reconciliation" process is briefly described as follows:

1. Upon completion of piping installation, the Braidwood Piping Contractor, Phillips, Getschow and Company (PGCo) prepares an "as-constructed" drawing of the piping. This drawing includes the as-constructed dimensions, angles, etc., required by the designer (S&L), as defined in the piping specification, L-2739.
2. The "as-constructed" piping drawing is transmitted to S&L for reconciliation (compared with the analysis).
3. S&L will reconcile discrepancies between as-analyzed and as-constructed dimensions, evaluating them against the specified allowable tolerances upon which the analysis was based and identify the discrepancies.



CECo Response to Item #10: (Cont'd)

4. Finally, S&L documents the reconciliation of the as-constructed subsystem with the analysis in the stress report.

It should be noted that this same approach of reconciliation against the piping analysis is utilized in responding to Field Change Requests for piping and pipe supports at the time the request is being made.

Thus Commonwealth Edison believes that the design procedures currently in place provide adequate checks to assure that the actual piping installation conforms to the latest design and therefore there is no need to include this work in BCAP.

NRC COMMENT #11:

The BCAP should include a review of the control of measuring and test equipment.

CECo Response:

Control of measuring and test equipment will be evaluated against specification requirements as a part of the RPSR element. This will verify that the specification requirements have been properly incorporated into the contractor's procedures.

In 1982, based on problems with control of measuring and test equipment at other nuclear stations, Commonwealth Edison Quality Assurance General Office conducted a special audit of its nuclear stations under construction. Braidwood was audited in this area from 9/20/82 thru 10/11/82. The audit resulted in the Braidwood site having a heightened awareness of the issues involved in this area. This awareness is reflected in the below listed requirements which were placed in the Edison Quality Assurance Manual:

1. An annual examination of a sample of calibration reports.
2. When test and measurement equipment is found out-of-tolerance on a calibration check or is lost, stolen or damaged, the contractor must perform an evaluation of its use since the previous date of calibration to determine any resultant impact.
3. That each site contractor be audited in the area of control of measuring and test equipment on an annual basis.

In addition, the Edison site Quality Assurance Department conducts surveillances in this area on at least a quarterly basis.

The number of audit findings and surveillance deficiencies during the past year and their distribution indicate that the implementation of the control of measuring and test equipment is being monitored effectively by the CECo Quality Assurance Program.

NRC COMMENT #12:

The BCAP should include a review of piping to structure clearance.

CECo Response:

As committed to the NRC in response to inspection report 84-09, S&L will perform a final walkdown for physical clearances within about six months prior to fuel load. This walkdown will identify the clearance of piping to all/any other interface. HVAC ducts and their supports as well as piping/piping supports will be included. Identification and disposition of all possible problem areas will be reviewed by S&L.

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NRC COMMENT #13:

The BCAP should include a review of cable tray and HVAC supports for non-documented loads.

CECo Response:

Within the CSR element of BCAP, a sample of HVAC, cable tray, and conduit supports will be reinspected. Any deviations from approved design drawings will be processed as observations. This will include the identification of unauthorized and undocumented attachments as observations.

Additionally, outside the scope of BCAP, Sargent & Lundy will perform and/or directly supervise/interface with designated personnel in a HVAC and cable tray support walkdown to identify any attachments and disposition those which are non-documented.

This walkdown, in conjunction with the cable tray and conduit separation and clearance walkdown, will be performed within about six (6) months prior to scheduled Fuel Load.

NRC COMMENT #14:

A detailed planning schedule, by discipline, should be provided to the NRC to permit closer monitoring of the program.

CECo Response:

Detailed planning and scheduling information, which will include scheduling by discipline, will be made available to the NRC at the Braidwood Site.

NRC COMMENT #15:

ERC should review a sample of discrepancies for which design calculations were performed by the A/E to support their evaluation for design significance to assure all potentially generic aspects of the deficiency have been evaluated.

CECo Response:

It is our understanding that ERC will perform this activity.

Response to NRC Protocol Comments [Enclosure 2]

The NRC letter of July 27, 1984 to Commonwealth Edison Company (CECO) concerning the Braidwood Construction Assessment Plan (BCAP) stated that "Appropriate protocol should be established for communications between members of the Independent Expert Overview Group (ERC) and employees of Commonwealth Edison Company and its contractors". Enclosure 2 of the NRC letter is the protocol suggested for use by the NRC.

We have reviewed the suggested protocol and agree with its intent. We accept the proposed protocol with minor modifications as indicated on Page 2 of this Attachment. Your acceptance of the modified protocol will not require any changes to the Braidwood Construction Assessment Program document.



PROTOCOL GOVERNING COMMUNICATIONS BETWEEN COMMONWEALTH EDISON COMPANY  
AND EVALUATION RESEARCH CORPORATION (ERC) IN THE BRAIDWOOD CONSTRUCTION  
ASSESSMENT PROGRAM

1. This protocol governs communications between Commonwealth Edison Company (CECo) and Evaluation Research Corporation (ERC) in its capacities as the Independent Expert Overview Group in the Braidwood Construction Assessment Program (BCAP).
2. All exchanges of correspondence, including drafts, between ERC and CECo will be submitted to the Administrator of NRC Region III at the same time as they are submitted to CECo.
3. ERC has a clear need for prompt access to information and activities required to fulfill its role. To this end, ERC may request documents, meet with and interview individuals, conduct telephone conversations, conduct audits and inspections, establish and witness program hold points, review work and inspection activities, and undertake similar activities without prior notification to the NRC staff.
4. As a normal program function, ERC may meet with CECo daily, or as necessary, to discuss program activities such as licensee work schedule, licensee activities overviewed, action items identified, action taken on identified items, resolution and close-out of these actions, audits conducted, and hold points witnessed. ~~A report shall be issued to document these meetings.~~ These meetings shall be open to NRC staff attendance. A RECORD OF THE CONDUCT OF SUCH MEETINGS WILL BE KEPT BY ERC. THESE RECORDS WILL BE AVAILABLE ON SITE FOR REVIEW BY THE NRC.
5. CECo and ERC shall meet with the NRC staff, initially monthly, to discuss the previous periods activities. Topics to be addressed will include the status of action items and any problems encountered. The meetings shall be open to public observation and shall normally take place on the first Thursday of each month at 9:00 a.m. and shall normally be held at a location in the vicinity of the Braidwood Station. Minutes of the monthly meetings shall be prepared and transmitted to the NRC and CECo.
6. All documents submitted to, or transmitted by the NRC subject to this Protocol, will be placed BY THE NRC in the NRC Public Document Rooms in Wilmington, Illinois and Washington, D.C., and will be available there for public examination and copying.

\*NOTE: Words capitalized and underlined have been added.