



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

RELATED CORRESPONDENCE

July 11, 1984

DOCKETED
USNRC

Ivan W. Smith, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

In the Matter of
COMMONWEALTH EDISON COMPANY
(Byron Station, Units 1 and 2)
Docket Nos. 50-454 and 50-455

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Dear Administrative Judges:

Counsel for NRC staff (all of whom were only recently assigned to this proceeding) were unaware until the conference call of July 5, 1984, of Licensing Board's requirement that prefiled testimony include summaries of the testimony. Accordingly, we did not provide such summaries when we prefiled our testimony on July 2, 1984.

We are, therefore, enclosing summaries of the "Testimony of NRC Staff on Remanded Issues with Respect to the Reinspection Program" and "Testimony of NRC Staff on Allegations Resolved Based (In Part or In Whole) on the Reinspection Program or Otherwise Relevant to the Reinspection Program." No summary of Mr. Keppler's testimony is deemed necessary since it is only two pages in length.

We apologize for any inconvenience caused by our delay in filing these summaries.

Sincerely,

Michael N. Wilcove
Counsel for NRC Staff

Enclosures: As stated

cc w/enclosures: See next page

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SUMMARY OF "TESTIMONY OF NRC STAFF ON REMANDED
ISSUES WITH RESPECT TO THE REINSPECTION PROGRAM"

Focussing on Hatfield Electric Company, Hunter Corporation and Pittsburgh Testing Laboratory, this testimony addresses the success of the reinspection program in resolving the Staff's item of noncompliance 50-454/82-05-19, 50-455/82-04-19. It makes the following principal points.

1. Because of the size and conservative biases of the sample, the reinspection program is adequate to determine if, from the beginning of construction through September 1982, Hatfield, Hunter and PTL QC inspectors were overlooking significant discrepancies.

2. The Applicant's acceptance criteria for evaluating the degree of agreement between the reinspection results and the original inspection results, and the Applicant's criteria for determining which work was reinspectable were acceptable.

3. The Staff monitored the implementation of the reinspection program and found it satisfactory.

4. The Staff found no improper documentation practices or "buddy system" that would call into question the validity of the results of the reinspection program.

5. Discrepancies uncovered during the reinspection program were analyzed by Sargent and Lundy and determined not to have safety significance. The Staff reviewed a sample of the Sargent and Lundy analyses and found them acceptable.

6. The results of the reinspection program indicate that from the beginning of construction through September 1982, Hatfield, Hunter and PTL QC inspectors were not overlooking significant discrepancies.

7. No inference, adverse to Hatfield, can be drawn from the fact that all Hatfield QC inspectors employed as of September 30, 1982 needed recertification to meet the Applicant's newly established minimum requirements at the inception of the reinspection program.

8. Although some Hatfield cables were found to be overstressed and shortcomings were found in the Hatfield cable installation procedure, resolution of both of these problems was satisfactory.

9. Although two matters preliminarily reported under 10 C.F.R. § 50.55(e) must be closed prior to fuel load, the Staff has not identified any pattern of non-conformances by Hatfield that would indicate widespread or significant problems with Hatfield work.

SUMMARY OF "TESTIMONY OF NRC STAFF ON ALLEGATIONS
RESOLVED BASED (IN PART OR IN WHOLE) ON THE REINSPECTION
PROGRAM OR OTHERWISE RELEVANT TO THE REINSPECTION PROGRAM"

This testimony discusses allegations which were either resolved in part or in whole by the reinspection program or otherwise have relevance to the reinspection program. It makes the following principal points:

1. Two allegations, concerning weld undercut and quality control inspector certification, were resolved on the basis of the reinspection program.
2. For three allegations concerning Hatfield welding, data from the reinspection program were reviewed to supplement the resolution of the allegations.
3. One allegation concerning the certification of a Hatfield QC inspector was substantiated. However, appropriate corrective actions were taken.