



Commonwealth Edison

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

October 29, 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
Response to Inspection Report
Nos. 50-456/84-25 and 50-457/84-24
NRC Docket Nos. 50-456/457

Reference (a): R. F. Warnick letter to Cordell Reed dated
October 4, 1984

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. R. N. Gardner on August 20 through September 20, 1984, of Braidwood Construction Assessment Program (BCAP) activities at Braidwood Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation as appended to Reference (a) is provided in the Enclosure to this letter.

Should you or your staff have any questions regarding this matter, please contact this office.

Respectfully,

Dennis L. Farrar
Director Nuclear Licensing

Enclosure

cc: NRC Resident Inspector - Braidwood
J. Hansel - ERC

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ENCLOSURE

COMMONWEALTH EDISON COMPANY

RESPONSE TO INSPECTION REPORT

50-456/84-25 AND 50-457/84-24

456/84-25-02; 457/84-24-02

ITEM OF NONCOMPLIANCE

1. 10 CFR 50, Appendix B, Criterion V, as implemented by the CECO QA Manual, QR No. 5.0, requires, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings, shall be accomplished in accordance with these instructions, procedures, or drawings.

Commonwealth Edison Quality Assurance Special Instruction QASI-04, Revision 0, "Training, Qualification and Certification of BCAP QA Personnel", required in Section 5.2 that BCAP QA personnel shall, as a minimum, have completed the Site Orientation before participating in formal reviews of procedures or instructions submitted to BCAP QA for review and acceptance.

Contrary to the above, formal reviews and approvals of BCAP procedures and instructions were performed by BCAP QA personnel who had not completed the site orientation.

RESPONSE

Commonwealth Edison Company agrees that formal reviews and approvals of Braidwood Construction Assessment Program (BCAP) procedures were performed by BCAP QA personnel who had not completed site orientation. However, a review of the site orientation required of regular site QA assigned personnel showed that its scope does not impact the performance of BCAP procedure reviews since those procedures relate to activities unique to BCAP.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Site Orientation was completed on September 13, 1984 and documented for all BCAP QA personnel in accordance with QASI-04, Revision 0, "Training, Qualification, Certification of BCAP QA Personnel". Also a management letter was placed on file to substantiate the acceptability of reviews performed by those individuals who had not completed Site Orientation.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

QASI-04 was revised on September 12, 1984 to change the timing for completion of site orientation to within four weeks of being assigned to the group instead of being a prerequisite for review and acceptance of procedures. A training requirements matrix was also added which included Site Orientation to assure that it would not be overlooked.

DATE OF FULL COMPLIANCE

Full compliance was achieved on September 13, 1984.