

DMB

JUL 27 1984

Docket No. 50-456  
Docket No. 50-457

Commonwealth Edison Company  
ATTN: Mr. James J. O'Conner  
Chairman and President  
Post Office Box 767  
Chicago, IL 60690

Gentlemen:

By letter dated June 22, 1984, Commonwealth Edison Company (CECo) forwarded to Region III the Braidwood Construction Assessment Plan (BCAP), and requested the NRC staff to review the BCAP and concur with the CECo approach. Additionally, CECo requested the NRC staff to overview the implementation and documentation of the BCAP activities.

The NRC has reviewed and considered the CECo proposed Braidwood BCAP dated June 1984. NRC believes certain changes should be made to the BCAP Program and these changes are provided as Enclosure 1.

Appropriate protocol should be established for communications between members of the Independent Expert Overview Group (ERC) and employees of Commonwealth Edison Company (CECo) and its contractors. Enclosure 2 is the protocol we suggest be used. This should ensure that communications are consistent with the independence requirements the agency desires for programs of this nature.

This letter constitutes Region III approval of the basic BCAP subject to incorporation of the NRC comments. Region III will review the implementing procedures, instruction and documentation as part of normal inspection activities.

Region III proposes that periodic meetings be held, initially monthly, between CECo, the Independent Expert Overview Group and the NRC, open to the public. The purpose of the meetings will be to discuss the previous months BCAP activities and any problems which may have been encountered. The initial monthly meeting should be scheduled within one month of the date of this letter.

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If you have any problems with the NRC suggested changes to the BCAP Program or the suggested protocol, please contact me.

Sincerely,

Original signed by  
James G. Keppler

James G. Keppler  
Regional Administrator

Enclosures:

- 1. BCAP Comments/Questions
- 2. Protocol Governing Communications

cc w/encls:

Cordell Reed, Vice President  
 D. L. Farrar, Director  
   of Nuclear Licensing  
 M. Wallace, Project Manager  
 D. Shamblin, Construction  
   Superintendent  
 J. F. Gudac, Station  
   Superintendent  
 DMB/Document Control Desk (RIDS)  
 Resident Inspector, RIII  
   Braidwood  
 Resident Inspector, RIII Byron  
 Phyllis Dunton, Attorney  
   General's Office, Environmental  
   Control Division  
 Jane Whicher, Esq.

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## BCAP COMMENTS

<u>Page</u>	<u>Comment</u>
I-2	The BCAP should identify the approximate percentage of the total effort represented by each element.
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.
III-1	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.
II-2	The BCAP should clearly identify functions which do not require the use of qualified and certified personnel.
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.
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.
III-3	The BCAP Director should report to the Manager of Projects.
IV-2	The BCAP Director should provide monthly reports to CECO management and the NRC simultaneously.
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.
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."
V-1	ERC should review some observations to ensure that appropriate ones are being documented as discrepancies (NCR's).
A-3	Large Bore Piping Snubbers should also be inspected for installation welds and/or bolting.

## General

- 1 The CSR should include a review of radiographs for field welds and shop welds.
- 2 The CSR Should review cable tray and conduit electrical separation.
- 3 The BCAP should include a review of a sample of site procurement documents.
- 4 The BCAP should include a review of onsite design activities.
- 5 The CSR should include a review of a sample of vendor supplied equipment for compliance with design.
- 6 The BCAP should include a review of equipment maintenance activities.
- 7 The BCAP should consider NRC inspection findings and concerns as well as INPO findings.
- 8 The ERC should review a sample of the implementing procedures of the Quality Assurance Overview Group.
- 9 The ERC should sample implementing procedures for each hardware discipline.
- 10 The BCAP should include a sample of piping stress isometrics compared to the latest revision of the design drawing.
- 11 The BCAP should include a review of the control of measuring and test equipment.
- 12 The BCAP should include a review of piping to structure clearances.
- 13 The BCAP should include a review of cable tray and HVAC supports for non-documented loads.
- 14 A detailed planning schedule, by discipline, should be provided to the NRC to permit closer monitoring of the program.
- 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.

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.
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 in the NRC Public Document Rooms in Wilmington, Illinois and Washington, D.C., and will be available there for public examination and copying.