

July 23, 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 Inspection Report

Nos. 50-456/83-09 and 50-457/83-09 NRC Docket Nos. 50-456 and 50-457

References (a): L. O. DelGeorge letter to J. G. Keppler

dated July 6, 1984

(b): J. G. Keppler letter to J. J. O'Connor

dated May 7, 1984

Dear Mr. Keppler:

Reference (a) provided the Commonwealth Edison Company response to the Reference (b) Inspection Report Number 50-456/83-09; 50-457/83-09 concerning our Braidwood Station. The purpose of this letter is to provide a supplemental response to Non-Compliance Item 3b.

As stated in our Reference (a) response to Non-Compliance Item 3b, Commonwealth Edison intends to prepare an NCR to disposition the lack of fit-up inspection on certain welds. During our review and evaluation to determine the scope of this NCR, we discovered that certain of the information provided in our Reference (a) response to Item 3b requires a revision. Enclosed is a supplemental response to Non-Compliance Item 3b in the form of a revised Page 23 to Reference (a).

Very truly yours,

E. Douglas Swartz

Nuclear Licensing Administrator

Attachment

cc: RIII Inspector - Braidwood

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## Response to Item 3b

## RESPONSE

Refer to the discussion under Item 3a.

Additionally, over 90% of all the HVAC welds can be inspected for fit-up after the weld is completed. Although BlO.2.F did not specifically require a check for the increased fillet size (when a 1/16" to 3/16" gap exists), all of the Pullman Sheet Metal Quality Control inspectors had been instructed in the AWS Code requirements and were aware of this requirement.

## CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Approximately eleven duct hangers include welds which cannot be fit-up inspected after weld completion. Two of these contain welds which were completed prior to the below stated procedure change to check full penetration fit-up prior to welding. An NCR will be written to request an engineering disposition of the lack of fit-up inspection on these welds. Equipment bases and gallery support standard details have some welds which cannot be checked for fit-up after welding completion. Fan bases for 1VXO7C and 2VXO7C have four (4) all around welds per base, and gallery supports for lVXO1F, lVXO3F, lVXO4F, lVEO1F, 2VXO1F, 2VXO3F, 2VXO4F, and 2VEO1F have all around welds of 4 x 4 x 3/8" angle to plates or structural steel. The all around welds on the fan bases were shop welded and not field welded. Pullman performs full dimensional checks on all cut members (i.e. members are saw cut squarely and checked to verify this). It would not be possible for squarely cut members welded together in the shop to be fit-up with a gap exceeding 1/16". The eight gallery supports are not installed. Commonwealth Edison Company believes the programmatic controls stated above were adequate to ensure correct fit-up of these welds.

Angle splice alternate details are the only other items which cannot be checked for fit-up after weld completion. These full penetration welds are either square butt or bevel type welds. Any fit-up problems could be corrected by addition of filler metal to attain the proper fit-up gaps. During the 100% weld reinspection program described below, these welds were inspected for evidence of improper fit-up. All welds were deemed acceptable.

Beyond that described above, Pullman Sheet Metal has reinspected 100% of all other accessible welds previously made. During this inspection program, improper fit-up was specifically inspected for, and items if found, were identified on Correction Notices. All reinspection was performed utilizing Sargent and Lundy supplied AWS acceptance criteria.