



Commonwealth Edison
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August 20, 1984

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

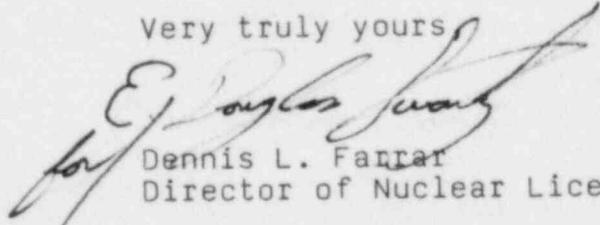
Subject: Braidwood Station Units 1 and 2
Response to Inspection Report
Nos. 50-456/84-07 and 50-457/84-07
NRC Docket Nos. 50-456 and 50-457

Reference (a): R. D. Walker letter to Cordell Reed
dated July 20, 1984.

Dear Mr. Keppler:

This letter is provided in response to the inspection conducted by Messrs. R. Schulz, J. Malloy and W. Kropp on March 26, 28-29, April 3-5, 10-12 and May 23 and 31, 1984 of activities at our 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.

Very truly yours,


Dennis L. Farrar
Director of Nuclear Licensing

Enclosure

cc: NRC Resident Inspector - Braidwood

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ENCLOSURE

COMMONWEALTH EDISON COMPANY

RESPONSE TO INSPECTION REPORT

50-456/84-07 and 50-457/84-07

ITEM OF NONCOMPLIANCE:

- A. 10 CFR 50, Appendix B, Criterion II, as implemented by Section 2 of the Commonwealth Edison (CECo) Quality Assurance Program (QAP) Topical Report, requires the program for the indoctrination and training of personnel to be documented by written policies, procedures or instructions and carried out in accordance with those policies, procedures or instructions.

Contrary to the above:

1. L. K. Comstock failed to establish and implement a program for identifying the required reading for weld inspectors as part of their required training for certification.
2. L. K. Comstock failed to establish and implement a suitable program for conducting practical tests for the purpose of ascertaining if prospective weld inspectors were proficient in identifying weld defects.
3. Gust K. Newberg Construction Company failed to adequately implement the personnel indoctrination and training program with regard to the grading of General Tests given to QC inspectors. Specifically, three of the six tests reviewed were misgraded.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

- A.1 Commonwealth Edison Quality Assurance Audit QA-20-84-512, Finding #4, identified that the required reading of applicable procedures by Quality Control Inspectors was not consistent. As part of the corrective action, a comprehensive review of the required reading for Quality Control Inspectors is being performed by L. K. Comstock. L. K. Comstock Procedure 4.1.3 Qualification, Classification And Training Of Quality Control Personnel, has been revised to formally specify the reading requirements for each area of certification.

- A.2 When conducting practical tests, L. K. Comstock typically used actual field installations. Therefore, depending on the particular installation, rejectable indications may or may not have been included in the practical test. Also, a score of 100% must be achieved on practical exams for a passing grade prior to certification. Commonwealth Edison Company Site Quality Assurance issued a letter (#BRD 10,936) to site contractors on April 18, 1984 requiring that samples with known defects be included in practical tests for Quality Control welding inspectors. L. K. Comstock Procedure 4.1.3 Qualification, Classification and Training of Quality Control Personnel, has been revised to amplify the requirements for practical examinations. Paragraph 3.5.1.2 now states that, where practical, items with and without known defects will be used for practical examinations.
- A.3 Commonwealth Edison Company instructed G. K. Newberg to write an NCR (213-767), and to perform a review of all personnel qualifications. If any discrepancies (i.e. misgraded tests) existed, the G. K. Newberg Company was to retest any individual who did not pass the tests and perform an inspection of a small sample of that individual's inspection work prior to the individual's satisfactory completion of retesting. This reinspection was to be completed by another qualified inspector. As noted on the NCR (213-767), two (2) individuals did not satisfactorily pass the general tests after a 100% review of personnel qualifications. These individuals were retested (both individuals successfully passed) and ten (10) of their first inspections were reinspected, (in accordance with the disposition on NCR (213-767)) by a qualified Level I and found acceptable. In addition, the Commonwealth Edison Company Site Quality Assurance group performed a review (surveillance #3523) of these qualifications for proper grading of tests.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

- A.1 L. K. Comstock Procedure Number 4.1.3 Qualification, Classification and Training of Quality Control Personnel has been revised and interim approval has been given by Commonwealth Edison Company.
- A.2 Procedure 4.1.3 has been revised. Revision C now states that where practical, accept/reject items are included in the practical exam.

- A.3 The G. K. Newberg Quality Assurance Manager has initiated an informal internal review of all personnel qualification packages by a Quality Engineer prior to processing by the Quality records clerk.

DATE OF FULL COMPLIANCE

- A.1 Implementation of the revised L. K. Comstock Procedure Number 4.1.3, and training of the Quality Control inspectors is expected to be completed by November 15, 1984.
- A.2 Implementation of the revised L. K. Comstock Procedure Number 4.1.3, and preparation of the practical test is expected to be completed by November 15, 1984.
- A.3 Full compliance has been achieved.

ITEM OF NONCOMPLIANCE:

- B. 10 CFR 50, Appendix B, Criterion II, as implemented by Section 2 of the CECo QAP Topical Report, requires the program to take into account the need for skills necessary to attain the required quality and to provide for indoctrination and training of personnel performing activities affecting quality.

Contrary to the above, four L. K. Comstock weld inspectors were not proficient in the American Welding Society Structural Welding Code, AWS D1.1. This was evidenced by their inability to answer questions pertaining to the repair of weld cracks and fit up tolerances.

DISCUSSION:

Commonwealth Edison Company believes that the L. K. Comstock weld inspectors are competent and have been competent to perform their assigned weld inspection tasks. Commonwealth Edison Company does, however, acknowledge that the weld inspectors had not received specific training in the AWS D1.1-1975 welding code itself. This occurred because the weld inspector training concentrated on the procedure used to perform the inspections (L. K. Comstock Procedure 4.8.3 Weld Inspection). Procedure 4.8.3 implements the job Specification L-2790 requirements for welding which indicates AWS D1.1-1975 as the applicable welding code.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

L. K. Comstock weld inspectors received site training on the AWS D1.1-1975 welding code by the Comstock Engineering Inc. Corporate Welding Engineer Level III. In addition, L. K. Comstock Procedure 4.8.3 Weld Inspection has been revised to further clarify the weld inspection requirements of AWS D1.1-1975.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

L. K. Comstock Procedure 4.1.3 Qualification Classification and Training of Quality Control personnel has been revised to include AWS D1.1-1975 as required reading. Procedure 4.8.3 has been revised (Revision F) to further clarify the weld inspection requirement of AWS D1.1-1975. Both procedures have received interim and/or final approval by the Commonwealth Edison Company.

DATE OF FULL COMPLIANCE

Full compliance has been achieved.

ITEM OF NONCOMPLIANCE:

- C. 10 CFR 50, Appendix B, Criterion XV, as implemented by Section 15 of CECO QAP Topical Report, requires that nonconforming items be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures.

Contrary to the above, L. K. Comstock weld inspectors allowed craft personnel to repair/rework weld defects identified during final QC inspections, thereby circumventing the nonconformance reporting system.

DISCUSSION:

To facilitate completion of an area, construction crews are sometimes assigned to work on reject/repair items. In such cases, the Quality Control inspectors, upon receiving the installation report, would inspect the welds, mark the rejectable area(s), and the construction crews would then make the repair(s). The inspector would then inspect the repaired area(s) and, if acceptable, complete the final inspection report noting the repair(s). Commonwealth Edison agrees that this practice does not meet the requirements of L. K. Comstock Procedure Number 4.11.1 Nonconforming Items, and Procedure Number 4.11.2 Corrective Action.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

A training session was conducted with the Quality Control personnel. The inspectors were instructed to issue an ICR or NCR, as appropriate, when nonconforming items are identified during final inspections. The training also emphasized that violations of procedural parameters identified during in-process inspections shall be documented.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The training session was conducted on March 30, 1984. Additionally, Commonwealth Edison Company Site Quality Assurance issued site contractors (ltr. BRD #10,937) further clarification regarding deficiencies noted during in-process or final inspections on April 18, 1984.

DATE OF FULL COMPLIANCE

Full compliance has been achieved.

ITEM OF NONCOMPLIANCE:

- D. 10 CFR 50, Appendix B, Criterion XVI, as implemented by Section 16 of CECo QAP Topical Report, requires conditions adverse to quality be promptly identified and corrected.

Contrary to the above, CECo did not take appropriate corrective action with regard to Audit QA-20-80-22, in that, an assessment of the QC inspectors qualifications was not performed to address the potential impact on work performed prior to the audit finding.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Commonwealth Edison agrees that Quality Assurance Surveillance No. 1480 which documented the close-out of the subject audit deficiency does not clearly address the basis for considering previous inspection activities as being acceptable.

This audit was performed as a result of increased interest in assuring that qualification and certification practices be clearly spelled out in a separate procedure. Thus, the concern of the Audit Team was the lack of a detailed procedure rather than the capability of personnel performing the inspections. It has always been Commonwealth Edison's practice to closely monitor the activities of contractor inspection personnel during routine surveillance of field activities and by periodic audit. We believe that the cause of the Noncompliance to be that of incomplete documentation.

The work of those inspectors certified by Napoleon prior to the issuance of Procedure #8 (approved on July 18, 1980) will be addressed as part of our Braidwood Quality Control Inspector Reinspection Program.

In view of concerns with properly documented close-out, corrective action will be taken to address other possible cases where audit deficiencies were closed without properly documenting the acceptability of previous work. Specifically, all Commonwealth Edison Site Quality Assurance deficiencies found during 1980 audits at Braidwood Station will be reviewed to assure properly documented close-out. The focus of this review will be to assure that the acceptability of past work was documented. If cases are identified in other audits where acceptability of past work was not considered, the sample will be expanded as appropriate.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Over the course of the last several years, Commonwealth Edison has made changes to enhance our Audit Program. These enhancements have addressed both the way in which audits are performed, and the method of reviewing corrective actions for close-out of deficient items.

Also, the Commonwealth Edison Quality Assurance Manual Procedures Q.P. 18-1 and Q.P. 18-51 were revised in July, 1983 to include the following:

"Audit deficiencies shall be closed only after corrective action completion has been verified."

In an effort to reinforce the importance of addressing past work when closing audit items, coverage of the proper evaluation and documentation of past work in the close-out of audit items will be added to the training outline for Commonwealth Edison Company auditor training course.

DATE OF FULL COMPLIANCE

1. The Quality Control Inspector Reinspection Program is expected to be complete prior to Fuel Load.
2. Our expected date for completion for review of the 1980 audit deficiencies is September 15, 1984.
3. The training outline for the Commonwealth Edison auditor training course was completed on July 26, 1984.

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