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DMB

November 9, 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
10 CFR 50.55(e) 30-day Report
Concrete Expansion Anchor Inspection Deficiencies
NRC Docket Nos. 50-456/457

Dear Mr. Keppler:

On October 10, 1984, the Commonwealth Edison Company notified Mr. W. L. Forney of your office of a potential deficiency reportable pursuant to 10 CFR 50.55(e) regarding existing concrete expansion anchor installations which are being extensively evaluated due to a review of inspection documentation at our Braidwood Station. This letter provides information concerning this matter to fulfill the thirty day reporting requirement and is considered an interim report. For tracking purposes, this potential deficiency was assigned number 84-17.

Description of Deficiency

A review of the Braidwood Station Contractor Programs for concrete expansion anchor (CEA) installations has revealed that:

1. The number and types of attributes considered significant to the quality of a CEA installation and verified by Quality Control personnel are not consistent with those observed in CEA Installation Programs at our LaSalle County and Byron Stations. Most of the attributes were verified by Production personnel at Braidwood Station.
2. A small number of those attributes considered significant to the quality of a CEA installation have not been verified by Production and/or Quality Control personnel.
3. An apparent trend exists of CEA installation rejections by the Quality Assurance Department's Independent Inspection Agency for attributes they have inspected.

Analysis of Safety Implications

If the lack of Quality Control verifications had allowed nonconforming installations to go unidentified, equipment could

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potentially shift during the unlikely occurrence of a seismic event, potentially resulting in the subsequent loss of the equipment's intended function.

Corrective Action Taken

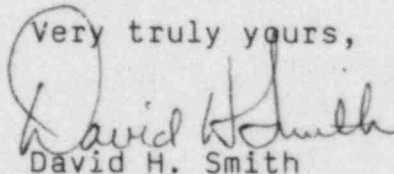
Commonwealth Edison Company Nonconformance Reports Numbers 658 (Unit 1) and 659 (Unit 2) have been issued to track and resolve this deficiency. The procedures affecting the installation of Concrete Expansion Anchors for the four contractors performing Safety Related installations (Philips Getschow Co., L. K. Comstock, G. K. Newberg and Pullman Sheet Metal) have been revised to include increased Production verification and Quality Control verification of all attributes considered significant to the quality of a CEA installation. These interim program changes were implemented by October 29, 1984.

In an effort to provide assurance that future CEA installations will be installed, inspected and documented in a consistent manner, the Commonwealth Edison Company, in conjunction with Sargent & Lundy, has developed a generic procedure for the installation and inspection of CEA's. This generic procedure includes recommendations of The Institute of Nuclear Power Operations (INPO) contained in INPO Good Practice (Draft) - "Installation of Concrete Expansion Anchors". This procedure is currently undergoing internal Commonwealth Edison Company and Sargent & Lundy review. Upon approval, this procedure, PCD-08 "On Site Contractor Installation and Inspection of Concrete Expansion Anchors", will be transmitted to the contractors performing CEA installation activities for implementation.

In an effort to ascertain the quality of past CEA work, a program is under development which will determine if the lack of Quality Control involvement in CEA activities has resulted in nonconforming installations. An interim report is expected to be submitted by February 1, 1985, addressing the status of program development and implementation.

Please address any questions that you or your staff may have concerning this matter to this office.

Very truly yours,



David H. Smith

Nuclear Licensing Administrator

cc: NRC Resident Inspector - Braidwood

Director of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555