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December 13, 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  
Braidwood Construction Assessment Program  
NRC Docket Nos. 50-456/457

- References (a): J. J. O'Connor letter to J. G. Keppler dated June 22, 1984
- (b): J. G. Keppler letter to J. J. O'Connor dated July 27, 1984
- (c): J. J. O'Connor letter to J. G. Keppler dated August 30, 1984
- (d): J. G. Keppler letter to Cordell Reed dated September 14, 1984

Dear Mr. Keppler:

Reference (a) transmitted to you the scope document for the Braidwood Construction Assessment Program (BCAP). In Reference (b), you provided comments upon the program which were addressed in Reference (c). This input, along with discussions with members of your staff and experience gained in implementing BCAP, necessitate a number of changes to the scope document. Those changes are contained in the Attachment to this letter.

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

Very truly yours,

*David H. Smith*

David H. Smith  
 Nuclear Licensing Administrator

cc: J. J. O'Connor

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Attachment

Errata and Changes to the  
BRAIDWOOD CONSTRUCTION ASSESSMENT PROGRAM (BCAP)  
Program Document of June 1984

1. Page II-1. In the second line, change "June 1" to "June 30", correcting the CSR sample date to be consistent with that used in the document for the RPSR (page II-8) element cutoff date.
2. Page II-1. In Item A, first line, change "... a significant sample ..." to "... a sufficient sample ...". This corrects an editorial error in the description of the size of the CSR program sample and makes the detailed section read as does the Executive Summary (page ES-1).
3. Page II-5. In Item 2, third paragraph, change the first sentence to delete "and the Architect/Engineer" which will delete the requirement for that organization to determine the root cause. The root cause is generally not determinable by the Architect/Engineer since its determination would likely require specific contractor and CECO investigation. The BCAP Task Force is currently required to perform this identification which should be sufficient. Procedures for BCAP will have the Architect/Engineer comment on the root cause rather than attempt its identification.
4. Page II-5 through II-8. Change the heading of Item 2 to read "2. CSR Results Evaluation and Sample Expansion Criteria". Replace the Item 2 paragraphs 4 through 8 (from "Based on the identification..." to the end of the section on page II-6 and the first paragraph on page II-8), including Table 1, with the following:

"Work in a construction category is considered acceptable if no design significant discrepancy is found in the initial sample.

"If a design significant discrepancy is identified in the initial sample, an additional sample will be chosen. Inspections of all attributes as inspected in the initial sample will be performed for this expansion sample.

"The results of this expansion sample will determine whether the initial design-significant discrepancy is an isolated case. If it is determined to be an isolated case, then no additional inspections will be performed. If, however, an additional design-significant discrepancy is identified in the expansion sample, then a comparison of the discrepancies for their root cause (or causes) will be performed. If the discrepancies have similar root causes, then 100% of the items potentially affected by the root cause will be reinspected. These inspections will be of the type sufficient to identify discrepancies similar in nature to those identified in the previous samples.

"If these design-significant discrepancies have unrelated root causes, then an additional sample will be reinspected for all attributes initially inspected to determine if either of these discrepancies is an isolated case or is representative of a programmatic discrepancy. If these cases cannot be determined to be isolated, then 100% of the accessible items in the population will be reinspected for all initially inspected attributes."

This revised evaluation criteria is changed per Reference (c) to an NRC comment on page II-5. This also incorporates the change of wording to the last paragraph, first sentence, as discussed in the meeting of September 6, 1984 and documented in the subsequent meeting minutes of September 13, 1984. The wording is the same as that in these documents, except that reference to a discrepancy being processed as a Non-Conformance Report has been removed since it already appears in the Program document on page II-5 in the subject item.

5. Page III-2. Delete the Figure 1 organizational chart's block at the lower right titled "Commonwealth Edison Company Designated Representative." This position is no longer necessary considering the establishment of the "Protocol Governing Communications between Commonwealth Edison Company and Evaluation Research Corporation (ERC)" per Reference (c) as approved by Reference (d).
6. Page IV-2. Change the last word from "objective" to "objectives" to correct a typographical error.
7. Page V-1 and V-2. Add "and to the NRC" to the end of sentences that have: "a copy to the President and Chairman of the Board of Commonwealth Edison." (last paragraph on page V-1 and third full paragraph on page V-2). This change requires the forwarding of periodic and a final report by the Independent Expert Overview Group to NRC in accordance with Reference (c).
8. Page V-2. Delete in the first full paragraph on this page "and will communicate with Commonwealth Edison through a designated Commonwealth Edison representative". The lines of communication are defined by the protocol agreement and other specific references such as the sentence that follows in the BCAP Program document.
9. Page V-2. In the second full paragraph, change "submitted to the designated Commonwealth Edison representative" to "submitted to the Commonwealth Edison Manager of Projects." This recognizes the elimination of the designated representative.

10. Page V-2. In the second full paragraph, change the last sentence, to read "All such observations or discrepancies will be resolved...". This avoids any inference that an observation could be left open and also resolves a comment by ERC (letter of July 2, 1984 from J.L. Hansel to T. Maiman).
11. Page A-1. In the second paragraph, change "Appendix C" to "Appendix B" to correct an editorial error.

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