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DMB

December 21, 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) No. 84-04 Interim Report  
Radiograph Film Density  
NRC Docket Nos. 50-456/457

- References (a): E. D. Swartz letter to J. G. Keppler  
 dated April 6, 1984
- (b): E. D. Swartz letter to J. G. Keppler  
 dated August 16, 1984

Dear Mr. Keppler:

References (a) and (b) provided information concerning a deficiency reportable pursuant to 10 CFR 50.55(e) regarding out-of-tolerance radiographic film densities at our Braidwood Station. The purpose of this letter is to provide an updated status of the corrective actions taken to resolve this issue. This letter is considered to be an Interim Report.

Status of Resolution

All radiographs currently available which were originally reviewed/interpreted by the site Independent Testing Agency prior to station shutdown (July 27, 1976 to September 16, 1979) have been re-reviewed for density and quality indications. The following tabulation identifies, by contractor, the total population of radiographs requiring investigation. The total number represents an increase from that previously reported in Reference (b).

1)	Production Radiographs (Phillips, Getschow)	974
2)	Phillips, Getschow Welder Qualifications	279
3)	G. K. Newberg Welder Qualifications	19
4)	Power Systems Inc. Welder Qualifications	84
5)	Universal Power Piping Welder Qualifications	2
	TOTAL	<u>1358</u>

The re-review completed as of November 27, 1984 by qualified Level II and/or III Interpreters, as necessary, has yielded the following results:

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- 1) Of the 965 production radiographs reviewed for both density concerns and quality related indications, 104 were not accepted. The current status of these 104 radiographic packages indicates that 31 have been repaired and/or re-radiographed to comply with Code requirements. The balance, 73 production radiographs, still require additional actions to achieve full Code compliance. These actions are currently underway.

The 9 additional production radiographic packages needed to account for all 974 radiographic packages have yet to be located. Consequently, Commonwealth Edison Company has directed the Independent Testing Agency to re-radiograph these 9 welds and provide results to Commonwealth Edison Company. These actions are also underway.

- 2) In regard to the 279 Phillips, Getschow welder qualification packages, all have been re-reviewed with 62 identified as not acceptable. Based on these results, Commonwealth Edison is currently developing a program to satisfactorily address the concern relative to Phillips, Getschow welder qualifications. This program, once developed, will be submitted to the NRC via a subsequent interim report.
- 3) For G. K. Newberg, 19 welder qualifications required review, with all 19 found acceptable. As a result of these welder qualifications meeting Code requirements, no further action is required.
- 4) For the period of interest 84 welder qualifications were radiographed for Powers Systems Inc. Because Power Systems Inc. has completed their scope of work relative to the Braidwood Project, they are no longer on site. Consequently, Powers System Inc. was contacted and requested to provide these radiographs to Commonwealth Edison Company for additional review. The written response from Powers Systems Inc. indicates that all welder qualification radiographs have been discarded and were no longer available for review.

As a result, Commonwealth Edison Company will establish if the work performed by Power Systems was safety related or non-safety related. If the work is determined to be non-safety related, no additional actions need to be taken. If the work performed is determined to be safety related, the program under development, for Phillips, Getschow discussed above will also apply to Powers Systems Inc. welder qualification packages.

- 5) The final contractor qualifying welders by radiography during the subject time frame was Universal Power Piping Inc. Only 2 welder qualifications were performed during this period for work being performed at the Commonwealth Edison Company's Dresden facility. Universal Power Piping Inc., has indicated that these radiographs have been discarded and are no longer available for review. After further investigation with Commonwealth Edison Company personnel at Dresden, it was determined that during the time frame referenced, Universal Power Piping Inc. was only performing work on Dresden Unit I. Because Dresden Unit I is currently being decommissioned, no further action needs to be taken.

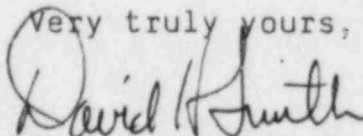
An Engineering Change Notice has recently been issued which allows Commonwealth Edison to now recognize radiographs with a density of up to 4.0 as acceptable. This is consistent with the 1977 Edition of the ASME Code requirements for radiographic film density. Consequently the balance of available film requiring disposition is undergoing another review to determine Code compliance. The results of this review will be included in a subsequent interim report.

We previously reported that, except for isolated instances, the rejected radiographs were initially reviewed and/or interpreted by a single individual. The radiographs described in this letter do not include additional radiographs reviewed by the subject individual thru 1980 or the sample of films reviewed by others thru 1980 which were re-reviewed in the course of our investigation of this issue. As reported in Reference (b), this additional re-review allowed us to conclude that the problem radiographs dated only from the 1976 through 1979 period discussed above.

A completion date for the above corrective actions can not be scheduled at this time. Consequently, a status report will be submitted by March 15, 1985.

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  
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Washington, D.C. 20555