



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

January 22, 1985

MEMORANDUM FOR: James G. Keppler, Regional Administrator
FROM: C. E. Norelius, Director, Division of Reactor Projects
SUBJECT: PROGRESS REPORT ONGOING INSPECTION OF BRAIDWOOD
CONSTRUCTION ASSESSMENT PROGRAM (BCAP)

The following information was provided by the NRC inspector assigned to follow the BCAP. It covers the period of January 7 through January 18, 1985. Similar type progress reports will be issued between the normal monthly inspection reports to inform NRC management of ongoing BCAP activities and issues.

BCAP Status

Construction Sample Reinspection (CSR) activities have continued in the areas of Heating, Ventilating, and Air Conditioning (HVAC) ducts, HVAC hangers, HVAC equipment, concrete placements, small bore pipe configurations, large bore pipe configurations, large bore rigid pipe supports, large bore non-rigid pipe supports, small bore pipe supports, conduit and conduit hangers. Cable tray reinspections were initiated during this review period. In addition, documentation reviews were continued in the area of small bore pipe configuration. The Reverification of Procedures to Specification Requirements (RPSR) BCAP element continues to experience delays in the initiation of procedure reverifications. The Review of Significant Corrective Action Programs (RSCAP) BCAP element has continued during this review period. ERC personnel have been onsite performing reviews. Total BCAP manpower is presently 104 personnel.

Review of BCAP Program

During this review period the inspector performed the following reviews of BCAP activities:

1. reviewed CSR reinspection checklists
2. reviewed CSR documentation review checklists
3. reviewed BCAP discrepancies
4. reviewed CSR reinspection activities
5. reviewed RPSR activities

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6. reviewed Construction Appraisal Team (CAT) BCAP findings
7. reviewed CSR overinspection activities

Problem Areas Identified

Two significant problems were identified during this review period. The first dealt with the Sargent and Lundy (S&L) evaluation of BCAP discrepancies. The inspector reviewed 80 discrepancies which had been evaluated by S&L and returned to the BCAP task force. The evaluations reference calculations which are not in the discrepancy file and are thus not reviewable. In addition, the S&L evaluations include the invalidation of discrepancies without sufficient justification. Open Item #11.

The second problem dealt with the findings of the NRC CAT team regarding pipe hangers which had previously been reinspected by the BCAP taskforce. These findings indicated that the BCAP reinspections did not identify all deficiencies present in the pipe hangers. Open Item #12.

Status of Open Items

To ensure the proper tracking and closure of open items identified in the NRC BCAP progress reports, all open items will be uniquely identified and tracked to closure.

Open items which have not been closed to date and their current status are as follows:

6. (Open) Inspector concerns with the qualifications of BCAP inspectors who were in the process of being certified. The licensee stated that BCAP inspectors will be certified in accordance with site requirements. This item will remain open until the certification process is complete and the inspector has reviewed BCAP inspector qualifications on a case by case basis.
9. (Open) ERC observation regarding reinspection deficiencies. While ERC has closed the original observation regarding reinspection deficiencies, additional observations have been issued by ERC regarding similar findings.

10. (Closed) The electrical cable reinspection checklist did not adequately address reinspection requirements. The inspector reviewed revision 1 to the subject checklist and determined that the revised checklist was acceptable. This item is closed.

C. E. Norelius

C. E. Norelius, Director
Division of Reactor Projects

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