



Commonwealth Edison
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December 26, 1984

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

Subject: Braidwood Nuclear Power Station Units 1 and 2
SALP Assessment
NRC Docket Nos. 50-456 and 50-457

Reference (a): J. G. Keppler letter to Cordell Reed
dated November 6, 1984.

Dear Mr. Keppler:

On November 26, 1984, representatives of Commonwealth Edison Company met with you and members of your staff to discuss the SALP 4 Board Report, as transmitted by Reference (a).

Commonwealth Edison Company appreciated the opportunity to discuss this report with you. We acknowledge your conclusions in Reference (a) that our "regulatory performance at the Braidwood Station was considered to be acceptable during this assessment period" and that our "regulatory performance within the SALP period showed an improving trend." Overall, we believe that this is a fair assessment of our performance.

Our detailed review of the SALP 4 Board Report did, however, reveal certain areas where we felt it appropriate that clarifying comments be entered on the record. First, we note that the Commonwealth Edison Company positions regarding each item of non-compliance have previously been docketed. The previous submittals included discussion of areas of disagreement between the NRC staff and Commonwealth Edison and, therefore, those discussions are not repeated in this transmittal. Other Commonwealth Edison Company comments are addressed in the enclosure.

We appreciate the NRC Region III Staff's effort toward providing a meaningful characterization of the overall safety performance for the Braidwood Station.

Very truly yours,

Cordell Reed
Vice President

Enclosure

cc: NRC Resident Inspector - Braidwood

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COMMONWEALTH EDISON COMPANY COMMENTS ON
BRAIDWOOD SALP 4 REPORT

1. Page 7, paragraph 5. It should be clarified that the allegation was recently received, after Commonwealth Edison Company reporting of the subject. Our decision to expand the sample inspection to 100% was based upon the initial sample results. The July 3, 1984 report explained that the sample inspection reports were being evaluated. Additional status was provided by David H. Smith letter to J. G. Keppler dated November 2, 1984.
2. Page 8, paragraph C.l.d. Inspection Report Nos. 50-456/83-09; 50-457/83-09 should be 50-456/84-09; 50-457/84-09.
3. Page 9, second to last paragraph, sentence 3. We believe that the as-built drawing process, which was always part of our program, provides requisite information to the design engineers for determining the adequacy of field installations.
4. Page 10, Paragraph 2, last sentence. The MTV effort is currently in progress. When the results have been finalized and evaluated, they will be submitted to the NRC.
5. Page 10, last paragraph. The exact purpose and objectives of the BCAP are defined in the BCAP scope document.
6. Page 19, paragraph h. Severity Level IV should be V.
7. Page 21, paragraph h. As we clarified in the November 26, 1984 meeting, our response to Inspection Report 83-09 indicated that an overinspection goal of 25% has been established. This has been accomplished in the area of visual weld inspection for most major contractors. Checklists have been prepared to permit broad overinspection coverage. Our percentage of overinspection will vary depending on the results of our selected inspections. For example; overinspections for concrete expansion anchor installation have been increased temporarily to 100%, Likewise, overinspection activity may decrease in selected areas, if warranted.
8. Page 21, paragraph k. The exact purpose and objectives of the BCAP are defined in the BCAP scope document.