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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

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In the Matter of: )  
COMMONWEALTH EDISON COMPANY )  
(Braidwood Nuclear Power )  
Station, Units 1 and 2) )

Docket Nos. #50-456 )  
#50-457 )  
OFFICE OF SECRETARY )  
DOCKETING & SERVICE )  
BRANCH )

Affidavit of Robert V. Seltmann

I, Robert V. Seltmann, being first duly sworn, hereby deposes and states as follows:

1. I am employed by Comstock Engineering Company as a Quality Assurance Manager at Braidwood Station.
2. My business address is Braidwood Nuclear Power Station, Braceville, Illinois 60407.
3. I have participated in the preparation of the response to Specific Interrogatories Nos. 58 and 59 filed by Intervenor Rorem, et. al. These interrogatories pose specific questions with respect to the 68 separate items of Intervenor's QA Contention. In particular, I have responsibility jointly with Mr. James W. Gieseke for the Responses to Items 4.B., 9.C., 10.F., 11.B., and 11.D. I also have responsibility jointly with Mr. Gieseke (i) for the portion of the Response to Item 4.A related to Comstock and (ii) for Item 6.E. except for the last paragraph which is supported by Mr. Hoffer
4. The Responses to Items 4.A. as corrected below, 4.B. as corrected below, 6.E as corrected, 9.C. as corrected below, 10.F. as corrected below, 11.B. as corrected below, and 11.D are true and correct to the best of my knowledge and belief.
5. In the middle paragraph on page 3 of the Response to Item 4.A., correct the reference to read "50-456/84-07-2A and 50-457/84-07-02A".
6. a. In the third paragraph of the Response to Item 4.B., change the word "specifications" in the last sentence to read "procedure".

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- b. Revise the fourth paragraph to read:

Although Comstock Procedure 4.8.3 always incorporated AWS D1.1-1975 as interpreted in S & L Specification L-2790, that procedure was revised to further clarify the weld inspection requirements of AWS D1.1-1975 as interpreted in S & L Specification L-2790. In addition, after the NRC finding, Comstock weld inspectors received on-site training on S & L specification L-2790 and weld inspection requirements by the Level III Corporate Welding Engineer of L. K. Comstock Engineering Inc. Moreover, Comstock Procedure 4.1.3 (Qualification Classification and Training of QC Personnel) was revised subsequent to the NRC finding to specify which inspectors were required to read AWS D1.1-1975 and S&L Specification L-2790.

- c. Delete the last paragraph.

- 7. a. In the third paragraph of the Response to Item 6.E., delete the words "Commonwealth Edison directed that" from the first sentence and change the word "be" appearing after "cables" to read "were".

- b. In the References, correct no. 9 to read "Commonwealth Edison Company QA Surveillance 4647".

- 8. a. In the fourth paragraph of the response to Item 9.C., delete the words "and Sargent & Lundy".

- b. In the fifth paragraph, item 1., revise the first sentence to read:

"LKC NCR 3275 has been issued to identify and disposition the violation of procedure 4.3.10."

- c. Delete the last paragraph.

- 9. a. In the first paragraph of the Response to Item 10.F., correct the reference to read "50-456/85-15 (DRP)".

- b. Add the following sentence to the second paragraph:

"Sargent & Lundy is now performing an engineering evaluation to determine dispositioning of NCR 4139."

- c. Revise the last sentence in the third paragraph to read:

"The matter is being reviewed by Commonwealth Edison and Comstock."

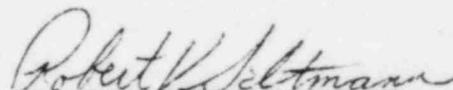
d. Delete the last paragraph.

10. Revise the sixth paragraph of the Response to Item 11.B. to read:

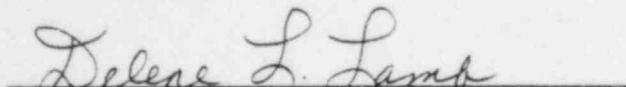
Subsequent to the NRC finding, Comstock generated Inspection Correction Reports 8067 and 8068 to address the hardware deficiencies. In addition, a review of the remaining quality control files for Unit 2 electrical penetrations was performed. As indicated on a Comstock Memorandum (copy enclosed) from Mr. Hii to Mr. DeWald, NCRs were written to track the items where corrective action documentation was lacking.

Document review procedures require the review of all quality control documentation to verify the existence of corrective action documentation for deficiencies indicated on inspection reports. General Inspection Reports are currently being reviewed under procedure 4.13.1. In addition, 4.13.1.1 is being revised (Rev. B) to specifically incorporate General Inspection Reports. This revision will require a review of General Inspection Reports to assure that there are no additional discrepant items that are not being tracked through the nonconformance system.

Further affiant sayeth not.

  
Robert V. Seltmann

Subscribed and sworn to before  
me this 2nd day of October, 1985

  
Notary Public

My Commission expires on 4/19/88.



# Comstock Engineering, Inc.

## Memorandum

To I. F. DeWald

Office: Braidwood

From J. P. Hii

Subject: NRC Concern on Unit II Penetrations

Date: 06/07/85

Control No. 85-06-07-01

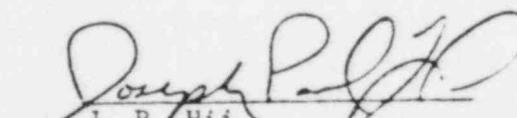
The following are the results of an NRC concern dealing with discrepancies noted on Form #104's (general inspection reports) for the Unit II penetrations. The G.I.R.'s were written describing various problems with the penetrations. However, an ICR or NCR was not generated to identify the discrepancy as outlined in Procedures 4.11.1 and 4.11.2.

1. A review of all Unit II penetration packages was performed.
2. The review resulted in 16 penetrations found where an ICR or NCR had not originally been generated.
3. Of the 16 penetrations, 8 have since had NCR's generated for the discrepancies outlined on the G.I.R.

<u>Penetration I.D.</u>	<u>NCR #</u>	<u>Penetration I.D.</u>	<u>NCR #</u>
2LV05E	4152	25I05E	4109
21V06E	4114	25I06E	4110
2LV07E	4151	25I07E	4111
2LV08E	4157	25I08E	4112

4. Of the remaining 8 penetrations, all have since been remodified and the Form #200's are within the package to show inspection results.

<u>Penetration I.D.</u>	<u>Date remodified</u>	<u>Penetration I.D.</u>	<u>Date remodified</u>
2AP85EA	02/04/85	2RD16E	12/01/84
2AP85EC	12/01/84	2RD17E	11/21/84
2AP85ED	10/16/84	25I01E	10/16/84
2RD13E	10/16/84	25I02E	11/30/84

  
 J. P. Hii  
 QC Supervisor