



Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

DMB

August 23, 1985

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

Subject: Braidwood Station Units 1 and 2
 Response to Inspection Reports Nos.
 50-456/85-023 and 50-457/85-024
NRC Docket Nos. 50-456 and 50-457

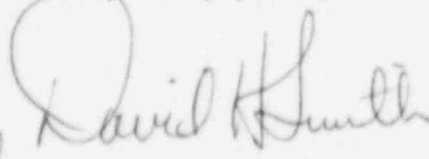
Reference (a): W. S. Little letter to Cordell Reed
 dated July 11, 1985

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. R. D. Schulz, L. G. McGregor, W. J. Kropp and R. N. Gardner on May 9 through June 21, 1985 of activities at Braidwood Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure. The delay in submitting this response was discussed with Mr. L. McGregor of your staff on August 9, 1985.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,


 for D. L. Farrar
 Director of Nuclear Licensing

/klj
 Enclosure

cc: NRC Resident Inspector - Braidwood

8602030126 850823
 PDR ADOCK 05000456
 Q PDR

IEO1
 8/27/85

ENCLOSURE
Commonwealth Edison Company
Response to
Inspection Report 456/85-023 and 457/85-024
Items 456/85-023-01 and 457/85-024-01

ITEM OF NONCOMPLIANCE

10 CFR 50, Appendix B, Criterion XIII, states in part, that measures shall be established to control the storage and preservation of material and equipment to prevent damage or deterioration. The Commonwealth Edison Company Quality Assurance Program contains in Quality Requirement (QR) 2.0 a commitment to Regulatory Guide 1.39, Revision 2.

Regulatory Guide 1.39, Revision 2, endorses the requirements of ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants". ANSI N45.2.3, Section 3.2.1, requires that scrap and excess materials shall be collected and disposed of in accordance with specified requirements. Such excess material shall not be allowed to accumulate and create conditions that will adversely affect quality.

Contrary to the above:

- a. Nails, washers, bolts, screws, wire, metal brackets and a grinding wheel were found in cable trays which had installed cable.
- b. The upper cable spreading room was noted as having debris in cable trays and empty aerosol cans which had contained a highly flammable liquid.
- c. High strength bolting material, (A490 and A325 galvanized bolts, which cannot be reused per the AISC Code) were found laying in various work areas of the plant, not controlled or stored in a material staging area.

RESPONSE

Commonwealth Edison acknowledges the concern identified by the NRC Inspectors and accepts the responsibility for housekeeping as a good construction practice. However, Commonwealth Edison feels that adequate measures do exist in the work and inspection procedures to assure that cables will not be damaged by debris during handling, and that debris will not be left in cable pans for extended periods of time. L. K. Comstock Procedures 4.3.8/4.8.8 (Cable Installation/Inspection Procedures) have specific requirements for cleaning and inspecting cable pans prior to additional cable installation. Additionally, Commonwealth Edison Company has received over the past year numerous good housekeeping compliments from various sources, including NRC personnel. Commonwealth Edison will continue to expend reasonable effort to maintain and ensure that cable pan cleanliness is at an acceptable level during construction.

ENCLOSURE
Commonwealth Edison Company
Response to
Inspection Report 456/85-023 and 457/85-024
Items 456/85-023-01 and 457/85-024-01

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The cable trays identified at the time of the inspection have been cleaned. Additionally, the Upper Cable Spreading Room cable trays have been inspected and cleaned in accordance with established procedure. The high strength bolts were removed and properly disposed of in those areas identified by the NRC inspector. Surveillances were conducted by housekeeping personnel to ensure other similiar instances of loose high strength bolts were not present throughout the plant.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCE

Commonwealth Edison and L. K. Comstock have taken the actions listed below which will result in an improved housekeeping status of the cable pan installations:

- (1) On June 11, 1985, Commonwealth Edison Company issued letters to site Contractors requesting increased emphasis by supervisory personnel to ensure cable trays remain free of foreign objects.
- (2) L. K. Comstock has strengthened their housekeeping procedure as well as assigning additional cleanup personnel to cable tray clean up. Currently, cable tray is cleaned on a rotational basis. The additional personnel will decrease the time periods between specific cable tray section cleanups.
- (3) Commonwealth Edison Company Site Quality Assurance has increased their housekeeping surveillance frequency to weekly with the main emphasis on cable tray cleanliness.

A June 27, 1985 Commonwealth Edison letter to Site Contractors directed them to place special emphasis on the control of fasteners and bolting materials. The action outlined in this directive will result in improved high strength bolting material control throughout the plant.

DATE OF FULL COMPLIANCE

Full Compliance has been Achieved.