

DmB

February 20, 1986

Docket No. 50-456
Docket No. 50-457

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Vice President
Post Office Box 767
Chicago, IL 60690

- Reference (a) R. F. Warnick letter to C. Reed dated March 8, 1985
- (b) D. L. Farrar letter to J. G. Keppler dated May 6, 1985
- (c) C. E. Norelius letter to C. Reed dated June 27, 1985

Gentlemen:

In our letter to you dated June 27, 1985, we advised you that we were reviewing your position stated in your letter dated May 6, 1985 responding to Violation 1 of the Notice of Violation (NOV) transmitted to you by our letter dated March 8, 1985. Our review of your position versus the requirements of ANSI 45.2.6 for Level I and II inspectors included seeking guidance from NRC Headquarters, and evaluating industry practice and discussing the matter with past and present members of the ANSI 45.2.6 Committee.

We have concluded that the correct interpretation of ANSI 45.2.6 inspection requirements is as follows:

A Level I inspector may perform inspections to an approved procedure, record the inspection results and accept the results as provided by the procedure. A Level II or III inspector is required to evaluate the Level I inspector's inspection results for validity and acceptability. The evaluation for validity and acceptability shall include reviewing the inspection data sheets and reports, and a periodic observation of the Level I work performance in the field.

We have reviewed our NOV and the related inspection report details (Inspection Report 50-456/85-006; 50-457/85-006, Details Section 3). We have concluded that the NOV did not clearly express our inspector's primary concern as stated on page 3 of the Report Details, "...the thrust of this issue concerns the acceptability of inspections performed and accepted solely by Level I QC inspectors." Our NOV should have been written citing the failure of the Level II inspectors to review the Level I inspection results for validity and acceptability. Recent inspections in which we interviewed those who were the Level II inspectors during the period of concern have indicated that the Level II review was directed toward confirming that the inspection records were properly filled out, not directed toward assuring the validity and acceptability of the inspection data. This additional information will be documented in the next inspection report written by John Jacobson.

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February 20, 1986

Based on the above we have concluded that the subject violation is valid. The corrective action described in your May 6, 1985 letter appears to be adequate. We will review your corrective actions during future inspections.

Your cooperation with us is appreciated.

Sincerely,

Charles E. Norelius, Director
Division of Reactor Projects

cc: D. L. Farrar, Director
of Nuclear Licensing
M. Wallace, Project Manager
D. Shamblin, Construction
Superintendent
E. E. Fitzpatrick, Station
Superintendent
P. L. Barnes, Regulatory
Assurance Supervisor
DCS/RSB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Braidwood
Resident Inspector, RIII Byron
Phyllis Dunton, Attorney
General's Office, Environmental
Control Division
D. W. Cassel, Jr., Esq.
J. W. McCaffrey, Chief, Public
Utilities Division
H. S. Taylor, Quality Assurance
Division
E. Chan, ELD
J. Moore, ELD
G. Berry, ELD
J. Stevens, NRR
The Honorable Herbert Grossman, ASLB
The Honorable A. Dixon Callihan, ASLB
The Honorable Richard F. Cole, ASLB

RIII RND
Gardner/qg
2/13/86

RIII JJA
Harrison
2/14

RIII JJA
Jacobson
2/14

RIII JJA
Little
2/14

RIII RFW
Greenman

RIII RFW
Norelius