



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

January 31, 1986

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  
Revised Response to Inspection Report Nos.  
50-456/85-041 and 50-457/85-040  
NRC Docket Nos. 50-456 and 50-457

REFERENCE: (a) J.J. Harrison letter to C. Reed  
dated November 1, 1985  
  
(b) D.L. Farrar letter to J.G. Keppler  
dated November 27, 1985

Dear Mr. Keppler:

Reference (a) identified a violation relative to the modification of certain safety-related riser clamps on Main Steam Lines inside containment (456/85-041-01; 457/85-040-01). Reference (b) provided Commonwealth Edison's response to that issue. The purpose of this letter is to revise that response.

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

Very truly yours,

*Anthony Miaz*  
for D.L. Farrar  
Director of Nuclear Licensing

ADM/pav

Attachment

cc: NRC Resident Inspector - Braidwood

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COMMONWEALTH EDISON COMPANY  
Response to Inspection Report 456/85-041; 457/85-040

VIOLATION

10 CFR, Appendix B, Criterion III, as implemented by CECO's Quality Assurance Manual, QR No. 3.0, require, in part, that design changes, including field changes to design documents be controlled and approved by the organization that performed the original design, unless the applicant designates an other responsible organization.

Contrary to the above, the piping contractor, Phillips, Getschow Company performed a design function by modifying several safety-related riser clamps on Main Steam lines inside the Containment for pipe supports LMS05007S, LMS06007S, LMS07006S, and LMS08007S without being directed by or receiving the approval of the responsible design organization prior to implementation of the work.

RESPONSE (456/85-041-01; 457/85-040-01

The Sargent & Lundy design drawings for component supports LMS05007S, LMS06007S, LMS07006S and LMS08007S required an ITT Grinnell Fig. 40 type B clamp. It was discovered during installation by Phillips, Getschow that ITT Grinnell had supplied Fig. 40 type A clamps instead of the required Fig. 40 type B clamps. The CECO Project Construction Field Engineer compared the support load against the ITT Grinnell Hanger Standard and determined that a type B clamp was required. During this review, the CECO Field Engineer was not aware that a special analysis had been performed on the Fig. 40 type A clamps resulting in a load capacity increase for the type A clamp. Because it was believed that the Fig. 40 type B clamp was required, CECO made the determination to modify the existing Fig. 40 type A clamps by adding stiffener plates to it thus creating a Fig. 40 type B clamp. Phillips, Getschow created a drawing detailing the addition of the stiffener plates. The design information such as weld size, stiffener plate size and location was taken from ITT Grinnell Hanger Standards and also from measuring an existing Fig. 40 type B clamp. Phillips, Getschow did not submit their drawing detailing the stiffener addition to Sargent & Lundy for review and approval prior to issuing the drawing to the field for the modification of the clamps. The physical work involved in modifying the clamp was controlled in accordance with Phillips, Getschow's approved procedures and properly documented. Commonwealth Edison does not believe that the creation of the Phillips, Getschow detail drawing constitutes a design function. However, Commonwealth Edison does agree that in this instance, since

the ITT Grinnell Hanger Standard was not a controlled design document issued by Sargent & Lundy to Phillips, Getschow for their use. Phillips, Getschow should have requested review and direction from Sargent & Lundy prior to performing the modification to the clamps.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Phillips, Getschow initiated Nonconformance Report (NCR) 5973 to resolve this issue. Commonwealth Edison Project Construction has processed this NCR through the Project Engineering Department. NCR 5973 was dispositioned "accept-as-is" based on Sargent & Lundy correspondence with ITT Grinnell approving this modification. NCR 5973 was closed on January 30, 1986.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

Commonwealth Edison believes this to be an isolated occurrence. To the knowledge of the Phillips Getschow Engineering Department Supervision, there are no other cases where Phillips, Getschow has modified component supports to fabricate items normally supplied by ITT Grinnell or other hanger material suppliers without prior Sargent & Lundy approvals. The responsible Phillips Getschow Engineering Supervisor has been made aware of the requirements violated. No further corrective action is planned.

DATE OF FULL COMPLIANCE

Full compliance has been achieved.

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