



Commonwealth Edison

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November 27, 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.
50-456/85-041 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

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. P.D. Kaufman on August 19 through October 17, 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.

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

Very truly yours,

Anthony Miose
for D. L. Farrar
Director of Nuclear Licensing

Enclosure

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. A telephone conversation with ITT Grinnell revealed that the Fig. 40 type B clamps were no longer being manufactured and therefore not available. Verbal conversation with Sargent & Lundy confirmed that the Fig. 40 type B clamps were required for these four component supports. In order to satisfy the requirements of the component support design drawings, Phillips Getschow had to modify a Fig. 40 type A clamp 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 a ITT Grinnell Load Capacity Data (LCD) Sheet for a Fig. 40 type B clamp which Phillips Getschow had in its possession. 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 clamps was controlled in accordance with Phillips Getschow's approved procedures and properly documented.

Commonwealth Edison does not believe that the transferring of detailed dimensions from the ITT Grinnell LCD to the Phillips Getschow detail drawing constitutes a design function. However, Commonwealth Edison does agree that in this instance, since the ITT Grinnell LCD was not a controlled design document issued by Sargent & Lundy to Phillips Getschow for their use, Phillips Getschow should have had their detail drawing reviewed by Sargent & Lundy prior to performing the modification to the clamps. Subsequent to the NRC Inspector identifying this concern, Phillips Getschow has submitted their drawings to Sargent & Lundy for approval.

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.

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

Closure of Phillips Getschow NCR 5973 is expected by December, 1985.

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