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July 28, 1986

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Re: In the Matter of Commonwealth Edison  
Company (Braidwood Station, Units 1 and 2),  
Docket Nos. 50-456 and 50-457 OL

Gentlemen:

Enclosed are computer printouts which reflect the results of two Commonwealth Edison (CECo) reinspection programs which focussed on L. K. Comstock QC accepted work: the PTL Overinspection Program; and the BCAP Construction Sample Reinspection (CSR). CECo presently expects to use this data in its rebuttal case as additional evidence that the effectiveness of L. K. Comstock QC inspections and the quality of Comstock QC accepted work were not impaired by alleged acts of "harassment and intimidation" and "pervasive production pressures" at Comstock. We provide these data bases to you now, in advance of the time for filing our rebuttal case, in an attempt to avoid unnecessary delays in these hearings.

The PTL data base is stored on magnetic tape used by Commonwealth Edison's IBM System 3090. The CSR data base is stored

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on a floppy disc for an IBM PC, using Lotus 1-2-3. Upon request copies of the magnetic tape and floppy disc will be made available to you. What follows is a description of the computer printouts provided with this letter.

There are six printouts which reflect the PTL overinspection data base. I shall refer to them by their Bates stamp numbers. AR000003-AR000004 is a two page printout showing monthly PTL overinspection results for Comstock QC weld inspections for the period July 1, 1982 through June, 1986.<sup>1/</sup> It has seven columns, which show: (1) the month in which Comstock (or BESTCo) performed weld inspections; (2) the number of Comstock QC accepted welds which PTL overinspectors found to be acceptable; (3) the number of Comstock QC accepted welds which PTL rejected; (4) the number of Comstock QC accepted welds rejected by PTL but found acceptable by Sargent & Lundy Level III inspectors (i.e. "overridden");<sup>2/</sup>

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<sup>1/</sup> PTL has performed overinspections of Comstock (and E.C. Ernst) QC accepted welds at Braidwood since 1977, although not continuously. For the period prior to July, 1982, the results of these overinspections have not been compiled or related to Comstock inspection dates or Comstock inspectors.

<sup>2/</sup> The S&L Level III override was added as a regular feature of the PTL overinspection program in June, 1985. Some of the welds which were rejected by PTL prior to June, 1985 have subsequently been found to be acceptable by S&L Level III inspectors who examined the welds for other reasons. These additional overrides are still being collected and are not included in the PTL overinspection data base.

(5) the total number of welds overinspected by PTL; (6) the agreement rate between Comstock QC inspectors and PTL overinspectors; and (7) the agreement rate taking into account the S&L Level III overrides. The totals for the four year period are given on AR000004; e.g., 28,422 Comstock QC accepted welds were overinspected by PTL, with an overall agreement rate (before S&L Level III override) of 92.56%.

AR000050-AR000151 is a 102-page printout which shows PTL weld overinspection results for each Comstock QC inspector for each (Comstock inspection) month.

As Commonwealth Edison's rebuttal testimony will indicate, prior to June, 1985 PTL was authorized by CECO QA to overinspect welds through paint. CECO's rebuttal testimony will also state that it was PTL's practice to identify on their inspection reports whenever they performed an overinspection through paint. AR000152-AR000251 shows for each Comstock QC inspector for each (Comstock inspection) month the number of welds which PTL overinspected in the painted and non-painted condition, and the total number of welds overinspected, as well as the corresponding overinspection agreement rates. AR000278-AR000279 is a printout of the totals for all Comstock QC inspectors and all four years. It shows that about 7% of the Comstock QC accepted welds overinspected by PTL were overinspected through paint.

AR000001-AR000002 and AR000005-AR000049 show overinspection results for objective (i.e. non-welding) attributes

for the period June, 1985 to June, 1986. Again, the results are presented on a monthly basis for all Comstock QC inspectors and for each Comstock QC inspector. Prior to June, 1985 PTL did not perform overinspections of non-welding attributes.

The remaining two printouts are for the CSR data base. AR000252-AR000253 is a two page computer printout which shows the names of the L. K. Comstock inspectors whose work was reinspected in the CSR. AR000254-AR000277 is a twenty-four page printout which shows the CSR results. The column labeled "Item" gives the CSR identification number for the hardware item reinspected. The next column indicates whether the item was selected for reinspection using statistically random methods ("R") or engineering judgment ("E"). The third column gives the Comstock QC inspector's initials. The fourth column gives the date that the Comstock QC inspector signed the inspection report. The fifth column indicates the type of attribute reinspected. "P" stands for cable pull, "T" stands for termination, "W" stands for welding, and "C" stands for configuration. The next two columns indicate the number of inspection points ("IP") for that item, and the number of such inspection points found to be discrepant in the CSR ("DP"). The final two columns show for each item the number of welds inspected and the number of welds found discrepant. (Thus, the results for welding inspections are presented on an inspection point basis and on a per-weld basis.)

The CSR data base includes all CSR results for the six BCAP electric construction categories, with two qualifications. Where no Comstock QC inspector could be identified for an item which was inspected in the CSR, the CSR results were excluded from this data base. Where more than one Comstock QC inspector had inspected the item which was later inspected in the CSR, the CSR results were included more than once (i.e., if there were two Comstock QC inspectors who performed welding inspections on the same hardware item, the CSR results were entered for each inspector).

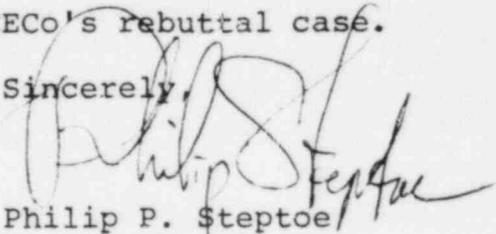
CECo expects to file rebuttal testimony explaining in detail how these two reinspection programs were conducted, the reliability of the reinspections, and the inferences which can be drawn from these results. We expect cross-examination on these matters. However, we hope that we can avoid spending hearing time on hearsay objections and technical foundation questions related to the compilation of these data bases, for example: whether the PTL, CSR, and Comstock inspection records which are the sources of this data are business records for purposes of the hearsay exception, whether the correct data was extracted from those records, whether it was properly entered into the computers, whether the computers were operating properly, etc. To this end, even though the time for discovery is over, we will respond in writing to reasonable written questions from intervenors relating to the compilation of these data bases.

In addition, upon reasonable notice we will make available for intervenors' inspection at the Braidwood site the PTL and Comstock QC inspection records which are summarized in these data bases. The CSR inspection records have of course been available at the site for intervenors' inspection since December, 1985. The "load sheets" which are the intermediate step between the inspection records and the computers will also be made available at the site, as will S&L documents reflecting their counts of inspection points, discrepancy points, welds and discrepant welds for purposes of the CSR data base.

Of course, all of these documents are also available for NRC Staff inspection.

If, after inspection of these documents and review of CECO's responses to informal discovery, as well as review of CECO's rebuttal testimony, intervenors still have hearsy or foundation type objections to the use of these two data bases, I respectfully request that intervenors let us know so that we can attempt to cure those objections without unnecessarily prolonging these hearings. I will assume that intervenors have no such objections unless I am informed to the contrary prior to the beginning of CECO's rebuttal case.

Sincerely,

  
Philip P. Steptoe

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cc Service List (w/o attachments except where indicated)