

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-456/85044(DRS); 50-457/85043(DRS)

Docket No. 50-456; 50-457

License No. CPPR-132; CPPR-133

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: Braidwood Station, Units 1 and 2

Inspection At: Braidwood Site, Braidwood, IL

Inspection Conducted: August 22, 23 and September 5, 1985

Inspector: *R. Mendez*
R. Mendez

9/26/85

Approved By: *Cordell Williams*
C. C. Williams, Chief
Plant System Section

9/26/85

Inspection Summary

Inspection on August 22 through September 5, 1985 (Report No. 50-456/85044(DRS); 50-457/85043(DRS))

Areas Inspected: Special, unannounced inspection of allegations; and licensee action on allegations. The inspection involved a total of 16 inspector-hours by one NRC inspector.

Results: No violations or deviations were identified.

DETAILS

1. Persons Contacted

Commonwealth Edison Company (CECo)

*L. M. Kline, Project Licensing and Compliance Supervisor
R. M. Preston, Director, Quality First

L. K. Comstock (LKC)

F. Rolan, QA Manager

The inspector also contacted and interviewed other licensee and contractor personnel during this inspection.

*Denotes those personnel attending the September 5, 1985 exit interview.

2. Review of Allegations

a. (Open) Allegation (RIII-85-A-0032)

As part of an allegation received on February 15, 1985, the alleged advised the NRC that: (1) the S&L Mylar Department was not secure which allowed anyone to come into the department and remove mylars and Engineering Change Notices (ECNs); (2) mylars and ECN books were being taken from the room without proper sign-out; (3) the document control room has inadequate file cabinets and bookcases; and (4) she was not provided with adequate training. The individual had previously discussed her concerns with the Braidwood site Quality First Team on January 14, 1985, after being contacted by the team for an interview.

Licensee Review

The licensee review of this allegation was documented in its records as Concern Number QF-85-291 as follows:

- (1) S&L and the licensee conducted audits of both the mylar and ECN document control systems during the period January 15 - August 7, 1985. The audit effort covered both past and current document control activities. The audit of the mylar control system identified approximately 2% administrative errors such as typing errors, timing of status posting, and misfiling of the mylar drawings. No deficiencies were identified during the ECN control system audit. The audits did not identify any instances where documents were improperly removed from the document control room.

- (2) The licensee determined that the document control room is staffed during working hours (including two shifts) and at other times when special work schedules require the document room to be open.
- (3) The licensee determined the document control room to be adequately sized early in 1985 after it had been enlarged in November 1984. With the increase in document flow to approximately 10,000 pieces of paper per month, the document control room was moved to a large trailer in April 1985.

NRC Review

The NRC inspector determined through discussion with S&L personnel that the alleged was in charge of mechanical pipe support mylars. Mylar drawings are translucent documents which are copied to produce blueprints.

- (1) During a review by the NRC inspector of the original document control room (where the alleged worked during the time that the allegation was made) it was determined that there was only one entrance into the room. Licensee personnel stated that the entrance to the room was blocked by a counter where drawings or ECNs could be signed-out. Licensee personnel also stated that it was the responsibility of the assigned clerk to keep unauthorized personnel out of the room. S&L management stated, however, that the clerk had allowed unauthorized personnel into the room on several occasions.
- (2) Mechanical support mylars are required by S&L Procedure BFFI-5 to be controlled and anyone checking out a mylar drawing was required upon receipt to provide their signature for tracking and accountability purposes. Based on discussions with S&L personnel and review of the reprimand the alleged received, it appeared that the assigned clerk (the alleged) had allowed mylar drawings to be checked out without receiving the required signatures. The inspector conducted a review of the control process for 50 randomly selected mylar drawings and all of the documents showed proper adherence to procedural requirements.
- (3) It was determined by the NRC inspector that original ECN documents are not released from the document control room. A copy of the ECN is made for the individual requesting the ECN. This practice was in accordance with the approved procedure and was found to be acceptable to the NRC.
- (4) According to S&L management, the assigned clerk (the alleged) had been given adequate verbal instructions for her task and was verbally warned about permitting unauthorized people into the room and the clerk was informed several times that she had complete control of access to the room.

- (5) The present document control room appeared adequate and mylars and ECN books were observed to be filed in an appropriate manner.

Conclusion

The allegation could not be substantiated. Based on the audit conducted by the licensee and the NRC inspection, no significant adverse conditions were noted regarding Mylar and ECN controls and facilities. It appears that adequate verbal instructions were given to the allegor to enable her to properly control activities at the document control room where she was assigned. This allegation remains open pending completion of Department of Labor action related to this matter.

b. (Closed) Allegation (RIII-85-A-0005)

On January 14, 1985, an allegor telephoned Region III and provided the following allegation:

The allegor stated that Comstock Rework Program is "full of loopholes and that the documentation flow through QC is not clear in the procedure." As an example, the allegor stated that seldom is a basemetal inspection performed. The allegor stated that the basemetal inspection is required to be done after a defective part is removed and before the replacement is installed.

NRC Review

The NRC inspector reviewed L. K. Comstock Procedure 4.3.2.4, Revision B, "Rework". The purpose of the procedure is to provide instructions to control and track rework. A review of the procedure indicated that it is clear and adequate in scope and applicability. The procedure requires that QC hold points be established and that the work described on the rework form be completed. For example, Comstock Engineering initiates a rework traveler (form No. 223) and rework tag which may establish a hold point. Form No. 223 requires that the licensee approve the traveler. The traveler is sent to the field along with the rework tag. A copy of the traveler is also sent to QC. When a designated hold point is reached, the craft foreman contacts the QC inspector for inspection. When QC determines that all the work has been properly performed, they remove the rework tag. The completed traveler and QC inspection report is then sent through LKC Engineering and QC for final review. Discussions with five QC inspectors indicated they had no problems following the procedure and that they had not experienced any instances of harassment and intimidation associated with the performance of this activity.

With respect to the allegation that base metal inspections were not being performed, the NRC reviewed approximately two hundred rework travelers in various stages of completion. Travelers were reviewed in the records vault, in the LKC engineer's office and in the field. Where applicable, it was noted that a hold point was established in

every situation requiring a base metal inspection. Additionally, L. K. Comstock weld inspection checklist form No. 19 requires that base metal be within the requirements described by L. K. Comstock Procedure 4.8.3, "Weld Inspection." All weld inspection checklists were noted to be properly signed off.

On August 23, 1985, the NRC inspector witnessed a hanger being removed in the field. The rework traveler noted that a base metal inspection was to be performed after removal of the hanger. The NRC inspector observed that this work was proceeding in accordance with the instructions.

Conclusion

The allegation could not be substantiated. Procedural requirements regarding rework and base metal inspections, including the associated procedures directing this element of the Comstock Rework Program, were found to be adequate and appropriately implemented.

3. Exit Interview

The inspector met with the licensee representative (denoted in Paragraph 1 above) at the conclusion of the inspection on September 5, 1985. The inspector summarized the scope and findings of the inspections noted in this report. The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any such document/processes as proprietary.