

EDO Principal Correspondence Control

FROM: DUE: 04/06/05 EDO CONTROL: G20050160
DOC DT: 03/02/05
FINAL REPLY:

Barry Quigley
Rockford, Illinois

TO:

Reyes, EDO

FOR SIGNATURE OF :

** GRN **

CRC NO:

Dyer, NRR

DESC:

ROUTING:

2.206 - Byron Station/1C RCS Cold Leg Loop Stop
Isolation Valve

Reyes
Virgilio
Kane
Merschhoff
Silber
Dean
Burns
Congel, OE
Caputo, OI
Caldwell, RIII
Cyr, OGC
Skay, NRR
Goldberg, OGC

DATE: 03/07/05

ASSIGNED TO:

CONTACT:

NRR

Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

Template: EDO-001

E-RIDS: EDO-01

March 2, 2005

Dear Mr. Reyes,

This is a request for enforcement action (under 10CFR2.206) against Exelon Nuclear's Byron Station for failure to comply with 10CFR50 Appendix B, Criterion XVI. Specifically, the 1C RCS Cold Leg Loop Stop Isolation valve (1RC8002C) has been broken for at least 6 years and has not been repaired.

The Byron Reactor Coolant System is equipped with Motor Operated Loop Stop Isolation Valves. These are sometimes difficult to close to the point of protective features of the motor actuating. Our current practice is to reopen the valve and keep attempting to close it until it goes all the way closed. The failure mechanism is metal-to-metal contact between the valve disc and a misaligned valve guide. A repair is available.

We are currently in refueling outage B1R13. Plans had been made for the last year to implement the repair; a high cost, high dose job. Two days before the outage, our senior management got together and started "sharpshooting" the schedule in an attempt to reduce dose. It was decided that if the valve closed without too much trouble, the repair would be pulled from the outage. This morning, the first closing attempt resulted in the protective feature actuating. However on the second attempt the valve closed completely and the repair for this outage cancelled.

I have several concerns:

1. The cultural aspect of accepting actuation of a protective function,
2. Failure to correct a longstanding equipment issue,
3. The excessive emphasis on dose reduction is compromising plant safety. To the uninitiated dose reduction sounds noble, in our case it is allowing the valve to continue to grind metal to metal, leaving debris in the RCS.
4. I would like to point out that a significant portion of the site executives' (and my) bonus is tied to meeting aggressive dose goals. This is similar to Davis-Besse where dose prevented adequate head inspections and focus on monetary bonuses by executives caused other major issues. Note that the Institute of Nuclear Power Operations sets these dose goals, so this may be an industry concern.

Due to the small time window available to repair this valve, I am requesting immediate NRC action.

Respectfully,

Barry Quigley
3512 Louisiana
Rockford, IL 61108
815-397-3392
815-222-4745

EDO --G20050160

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Creation Date: 3/2/05 4:59PM
From: <barry.quigley@exeloncorp.com>
Created By: barry.quigley@exeloncorp.com

Recipients

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SDW2 (Sandra Walker)

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nrc.gov

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| Exelon 2.206 Petition.doc | 23040 | |
| Mime.822 | 34671 | |

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