Commonwealth Edison
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June 28, 1979

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Byron Station Units 1 and 2
Response to IE Inspection Report
Nos. 50-454/79-08 and 50-455/79-08
NRC Docket Nos. 50-454 and 50-455

Reference (a): May 30, 1979 letter from G. Fiorelli to Byron Lee, Jr. transmitting IE Inspection Report Nos. 50-454/79-08 and 50-455/79-08

Dear Mr. Keppler:

Reference (a) transmitted an inspection report regarding an inspection conducted on May 8-9, 1979 by Messrs. J. E. Konklin and H. H. Livermore of your office of activities at Byron Station. That report identified an apparent item of noncompliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison Company's response to this item.

Please address any additional questions that you might have to this office.

Very truly yours,

C. Reed

Cordell Reed
Assistant Vice-President

attachment

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ATTACHMENT A

NRC Docket Nos. 50-454/455

INFRACTION (79-06-01)

10 CFR 50, Appendix B, Criterion XIII, states, in part, that "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment... to prevent damage or deterioration". Byron Topical Report No. CE-1-A, Revision 5, commits Commonwealth Edison to the requirements of WASH 1309, "Guidance on Quality Assurance Requirements during the Construction Phase of Nuclear Power Plants," and through WASH 1309 to the requirements of Regulatory Guide 1.38/ ANSI N45.2.2.

ANSI N45.2.2, Section 3.5.1, states, in part. "Caps and plugs shall be used .... to protect threads and weld end preparations". Section 6.4.2 of ANSI N45.2.2 states, in part, "Covers removed for internal access at any time for any reason shall be immediately replaced and resealed after completion of the purpose for removal". Section 6.2.2 of ANSI N45.2.2 states, in part, "Cleanliness and good housekeeping practices shall be enforced at all times ....." Section 6.5 of ANSI N45.2.2 states, in part, "Items released from storage and placed in their final locations within the power plant shall be inspected and cared for in accordance with the requirements of Section 6 of this standard ....."

Contrary to the above, on May 8-9, 1979, the inspectors observed the following:

a. The end caps on fourteen instrumentation thimbles on the Unit 1 reactor vessel bottom head were found to be torn open; the weld preps on two of the thimbles were completely exposed.

b. A coating of an oily substance was observed on the bottom and side of the reactor vessel exterior, extending upward between the reactor vessel and the surrounding reflective insulation.

c. Oily dirt, dirty rags and other debris were observed on the lower core support plate, the flow mixer plate, the lower thimble guide tube support plate and the thimble guide tubes, all parts of the Unit 1 reactor internals.

d. A number of main coolant piping nozzles on reactor coolant loops No. 1 and 3 were open, with the weld prep areas unprotected from possible damage.

e. The reactor coolant loop No. 1 main coolant pump volute was open, and 17 of the 24 motor-to-volute threaded bolt holes were uncovered and unprotected from possible damage.

f. The steam generator manway hatches on reactor coolant loops No. 1 and 3 were open to the atmosphere, although there was no work in progress which required the hatches to be open.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

With regard to the above items, Commonwealth Edison has taken the following action:

a. The end caps which had deteriorated and the end caps which were missing were removed, and the instrumentation tube ends were reprotected.

b. Commonwealth Edison is reviewing various cleaning methods for removal of the oily substance. The criteria and method will be documented and performed and inspected prior to placement of the remaining reflective insulation.

c. The rags and debris in question were removed. The lower internals will be cleaned to designer/manufacturer's requirements and procedures prior to installation for cold hydro of the reactor vessel and will be recleaned prior to reinstallation for hot functional testing.

d. When required, main coolant piping nozzles will be left open to provide pathways for argon purge hose access to the purge dams being used. Nozzles likewise will be left open to provide entry and exit for work and non-destructive examination activities which occur on third shift. When access is not required for any of the above operations, the nozzles will be protected with end caps.

e. The reactor coolant pump casings must remain open to provide entry and exit for work and non-destructive examination activities within the cross-over leg and cold leg of the primary loop. When work activities within the cross-over leg and cold leg are complete, the pump casing will be closed. The motor stand-to-casing stud holes which were uncovered have been reprotected.

f. When required, the steam generator manway hatches will be left open to provide pathways for argon purge hose access to the purge dams being used. Manway hatches likewise will be left open to provide entry and exit for work and non-destructive examination activities which occur on third shift. When access is not required for any of the above operations, the manway hatches will be closed.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

Commonwealth Edison is developing separate documentation to survey components during the period from installation to initiation of pre-operational testing. This documentation will be an extension of the existing measures established to control the handling, storage and preservation of components from the time of receipt to installation.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by August 1, 1979.