



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

November 13, 1980

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

Subject: Byron Station Units 1 and 2  
Response to IE Inspection  
Reports 50-454/80-18 and 50-455/80-17  
NRC Docket Nos. 50-454 and 50-455

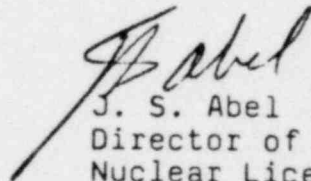
Reference (a): October 16, 1980 letter from J. G. Keppler to  
C. Reed

Dear Mr. Keppler:

Reference (a) contained the results of an inspection conducted by Mr. M. P. Phillips of your office on September 15-16, 19 and 22-23, 1980, of activities at Byron Station. During this inspection, certain activities appeared to be in noncompliance with NRC requirements. Commonwealth Edison Company's responses are contained in Attachment A to this letter.

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

Very truly yours,

  
J. S. Abel  
Director of  
Nuclear Licensing

Attachment

cc: Zion Resident Inspector

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Attachment A

RESPONSE TO NOTICE OF VIOLATION

Deficiency 1:

Section 3.E.2 of Construction Permits CPPR-130 and CPPR-131 requires, in part, that a control program shall be established by the applicant to provide for a periodic review of all construction activities to assure that those activities conform to the environmental conditions set forth in this permit. The control program, "Finalized (Revised 4-21-76) Onsite Environmental Monitoring Program," requires, in part, that the onsite coordinator or his designated representative shall conduct daily, weekly, and monthly checks of construction activities on the plant site using the check lists included in this procedure. The completed check lists shall be forwarded to the Site Project Superintendent for his approval and then forwarded to Quality Assurance for approval and filing to become part of the permanent documentation.

- a. Contrary to these requirements, no daily check lists were filed in the permanent records for the dates of November 7, 1978; September 7, 1979; and September 10, 1979.
- b. Contrary to these requirements, the October 26, 1979 monthly check list, the July 10, 1980 check list, and the July 6, 1979 check list were all incompletely filled out with sections left blank as to whether or not they were checked.
- c. Contrary to these requirements, the July 1979 and August 1979 monthly check lists were marked indicating no groundwater samples were collected in area C, when in fact samples had been collected and analyzed.

Corrective Action Taken and Results Achieved

As indicated in the inspection report (page 4) all of the check lists were corrected prior to the completion of the inspection. The corrected check lists have been approved by the Site Project Superintendent and the Site QA Supervisor and filed as part of the permanent documentation.

Corrective Action Taken to Avoid Further Noncompliance

The proper use of the checklists has been reviewed with the site environmental coordinator. He has been reminded that strict adherence to the checklist procedure is required.

Date When Full Compliance Will Be Achieved

September 23, 1980

Deficiency 2:

Section 3.E.1. of Construction Permits CPPR-130 and CPPR-131 requires, in part, that the applicant shall take the necessary mitigating action, including those summarized in Section 4.5 of the Final Environmental Statement, during construction of the station and associated transmission lines to avoid unnecessary adverse environmental impacts from construction activities. Commitment 12 of Section 4.5.1 of the Final Environmental Statement requires, in part, that upon completion of construction, the pipeline trench will be backfilled and regraded; the entire corridor will be replanted and the land will be disturbed no further. All ruts or depressions deeper than six inches will be graded immediately, and any plowing or disking required will be carried out before reseeding.

Contrary to these requirements, an area of erosion approximately two feet deep was observed near the northwest corner of the site, near the sewage outfall in the pipeline corridor and no attempt had been made to prevent it by grading the area.

Corrective Action Taken and Results Achieved

The area of erosion has been graded and a layer of aggregate stones placed over the graded area to prevent further deterioration.

Corrective Action Taken to Avoid Further Noncompliance

The deficiency cited should have been detected through the use of the checklists discussed in Deficiency 1. The site environmental coordinator has been admonished and reminded that strict adherence to procedures is required.

Date When Full Compliance Will be Achieved

October 1, 1980