

February 23, 1981

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 50-454/80-24 and 50-455/80-22 NRC Docket Nos. 50-454 and 50-455

Reference (a): January 26, 1981 letter from G. Fiorelli

to C. Reed

Dear Mr. Keppler:

Reference (a) contained the report of an inspection conducted by Mr. C. E. Jones of your office on December 9-12, 1980 at Byron. During that inspection it was determined that certain activities were in noncompliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation which was appended to Reference (a).

To the best of my knowledge and belief the statements contained in Attachment A are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address any questions regarding this matter to this office.

Very truly yours.

S. Abel Director of

Nuclear Licensing

Attachment

SUBSCRIBED and SWORN to before me this 2720

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Notary Public

ATTACHMENT A

Response to Notice of Violation

VIOLATION

10 CFR 50, Appendix B, Criterion II states in part, "Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of ...; and assurance that all prerequisites for the given activity have been satisfied."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 9, dated July 16, 1979, states in Paragraph 1.A that "Commonwealth Edison Company is ultimately responsible for the assurance of quality ir all phases of the design, procurement, construction, modification, testing and operation of the Station...Edison has prime responsibility for controlling the quality of on-site work by field contractors."

Contrary to the above, a number of the anchor bolts for the Unit 2 Essential Service Water (ESW) pump and diesel engine foundation anchor plates were observed to have sharp radius bends which were improperly made to correct gross misalignment with holes in the pump-diesel mounting plates. The Unit 1 pump and diesel had been set previously. Additional investigation indicated the Unit 1 equipment had been mounted and the base grouted covering similarly bent anchor bolts.

Corrective Action Taken and Results Achieved:

As identified in inspection report, nonconformance report NCR F-514 was initiated on 6/23/80. the anchor bolts were removed and replaced in accordance with design document ECN 1683. The installation of the replaced anchor bolts was inspected by the installing contractors quality control staff and by Commonwealth Edison's quality assurance staff prior to replacement of grout.

Additionally, an ultrasonic examination of a sample of other installed equipment was performed to establish if similar conditions existed. The ultrasonic examinations indicated there were no deficiencies.

Corrective Action Taken to Avoid Further Noncompliance:

The equipment installation contractor's procedures have been revised to make inspection, by contractor's quality control staff, of anchor bolts prior to release for grouting a mandatory inspection in lieu of an optional inspection. Additionally, increased surveillance by Commonwealth Edison's quality assurance staff has been undertaken in the area of equipment installation.

Date When Full Compliance Will Be Achieved:

Replacement of anchor bolts, ultrasonic examination of other installed equipment, and revision to procedures was complete in August 1980.