



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

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June 27, 1983

Mr. James G. Keppler, Regional Administrator
U.S. Nuclear Regulatory Commission - Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Byron Generating Station Unit 1
Inspection Report No. 50-454/83-16
NRC Docket No. 50-454

Reference (a): May 31, 1983 letter W. S. Little
to Cordell Reed.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. R. S. Love on March 21-25, and April 4-8, 1983, of activities at Byron Station. During that inspection certain activities were found to be in noncompliance with NRC requirements. Commonwealth Edison's response to the Notice of Violation attached to reference (a) is provided in Attachment A to this letter.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based upon 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.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

VIOLATION

10 CFR 50, Appendix B, Criterion II, states, in part, "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Commonwealth Edison Company (CECo) letter, L. O. DelGeorge to D. G. Eisenhut, U.S. NRC, Director, Division of Licensing, dated August 17, 1981, affirmed CECo commitment to Regulatory Guide 1.146, August 1980 and ANSI N45.2.23-1978 as required by Generic Letter 81-01.

ANSI N45.2.23-1978, paragraph 2.3, states, "An individual shall meet the requirements of paragraphs 2.3.1 through 2.3.5 prior to being designated a lead auditor."

ANSI N45.2.23-1978, paragraph 2.3.1, states, in part, "Education and Experience. The prospective lead auditor shall have verifiable evidence that a minimum of ten (10) credits under the following scoring system have been accumulated. Education (4 credit maximum). Experience (9 points maximum). Other credentials of professional competence (2 credit maximum). Rights of Management (2 points maximum).

Contrary to the above, the Commonwealth Edison Company Quality Assurance Lead Auditor performing the Power-Azco-Pope audit was not adequately qualified and/or trained to perform lead auditor functions. Details of apparent noncompliance to the above requirements are delineated in paragraph 3.A.(1) of the attached report.

Response

The lead auditor's certification as an Interim Lead Auditor was carefully and selectively established on the basis of demonstrated capabilities in the performance of his work, technical competence and mature judgement, audits as an auditor, satisfactory completion of training in auditing and non-destructive testing involving MT/PT, RT, UT and Visual Inspection, satisfactory participation in an ASME Survey, serving as a knowledgeable instructor involving several welding and codes and standards training classes and proficient performance in eight audits including six as an auditor (ANSI N45.2.23 requires a minimum of five (5) for Lead Auditor.) This individual had eight points of the ten required for certification. The only area in which the individual did not specifically meet ANSI N45.2.23 was the two year experience in Quality

Assurance requirement. He had approximately eighteen months of Quality Assurance experience. This person is a graduate Welding Engineer and for this reason was recruited and hired to provide expertise in welding and in codes and standards. Because he performed exceptionally well in carrying out this type of assigned work, because he had expertise in welding plus codes and standards and was a graduate Welding Engineer, because he had more than adequately met all the technical requirements and because he was required to carry out his auditing activities directly under the supervision of a Quality Assurance Supervisor who was a Lead Auditor, it was deemed acceptable to establish him as an Interim Lead Auditor because it could be clearly demonstrated that the person had experience, could perform the audit acceptably and did perform the various interim lead auditor functions under the supervision of a qualified Quality Assurance Supervisor. Under the role of Interim Lead Auditor, audit checklists and reports are required to be formulated under the supervision of at least a supervisor as well as be reviewed and approved by a supervisor.

As a result of this required supervisory involvement in the formulation and approval of the audit checklist, the review and acceptance of the checklist objective evidence and the approval of the audit reports by Quality Assurance Supervision, we are confident that the audits were performed and reported acceptably and that proper corrective action was achieved. Also, subsequent and repeated coverage by surveillances and other audits by other people adds to our confidence that the audits performed under a designated Interim Lead Auditor are acceptable.

It has not been standard practice to establish Interim Lead Auditors. On the contrary, only on rare occasions, after careful evaluation and where there was dire need, and the person had more than a year of Quality Assurance experience, and had demonstrated technical competence, mature judgement, and lead auditor attributes, was an Interim Lead Auditor established. In all cases, such appointees worked directly under the supervision of at least a supervisory level person as described above.

ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

The Interim Lead Auditor concept has been discontinued and a request has been submitted to ASME/ANSI requesting that other provisions be provided in the Standard for giving points for experience.

DATE WHEN FULL COMPLIANCE SHALL BE ACHIEVED:

June 15, 1983