



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

February 26, 1982

Mr. James G. Keppler, Regional Administrator
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
Interim Response to I.E.
Inspection Report Nos.
50-454/82-01 and 50-455/82-01
NRC Docket Nos. 50-454 and 455

Reference (a): C. Norelius letter to Cordeil
Reed dated January 27, 1982.

(b): E. E. Potter letter to K. Ward
dated January 27, 1982.

Dear Mr. Keppler:

Reference (a) provided the Commonwealth Edison Company with the results of the routine safety inspection conducted by Mr. K. D. Ward of your office on January 12 and 14, 1982, of activities at our Byron Station, Units 1 and 2. Reference (a) indicated that certain activities appeared to be in non-compliance with NRC requirements. The following is provided as an interim response to this notice of violation.

The non-compliance alleges that NDE (radiographic) techniques utilized by Southwest Fabricating and Welding Company were not performed in accordance with ASME Section V Code requirements. It is our judgment that we are not in violation of the intent of the Code as it applies to the placement and numbers of penetrameters utilized by Southwest.

As explained in our Reference (b) letter, the Code is ambiguous on this matter. In order to resolve our divergent interpretations of the Code words, we proposed to make a Code Inquiry to Subcommittee V of the ASME Boiler and Pressure Vessel Code for interpretation. This inquiry was submitted on February 2, 1982.

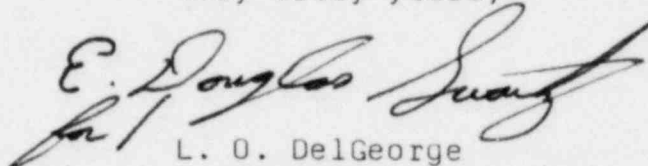
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We respectfully request that the NRC hold this item in abeyance until July 1, 1982, in order to allow Commonwealth Edison time to obtain the requested Code opinion from Subcommittee V. At that time we will provide our final response. May we please receive your concurrence with this interim approach.

Please be advised that Commonwealth Edison requested Southwest to discontinue this particular technique which they did on January 22, 1979. Our Byron Station on-site Q.A. Department performed a surveillance of Southwest radiographs which concluded that this technique was in fact discontinued.

Please address any further questions that you or your staff may have concerning this matter to this office.

Very truly yours,

A handwritten signature in dark ink, appearing to read "L. O. DelGeorge". The signature is fluid and cursive, with a large, sweeping "L" and "D".

L. O. DelGeorge
Director of Nuclear Licensing

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