



**Commonwealth Edison**

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

November 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  
IE Inspection Report  
Nos. 50-454/81-16 and 50-455/81-12

Reference (a): October 23, 1981 letter from C. E. Norelius  
to C. Reed

Dear Mr. Keppler:

Reference (a) contained the results of an inspection  
conducted by Mr. R. S. Love on September 22-25, 1981 at Byron  
Generating Station. During that inspection it was determined that  
certain activities were not in compliance 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 upon my personal knowledge but upon  
information furnished by other Commonwealth Edison employees and  
contractors. Such information has been reviewed in accordance with  
Company practice and I believe it to be reliable.

Please address questions regarding this matter to this  
office.

Very truly yours,

L. O. DelGeorge

Director of Nuclear Licensing

Attachment

SUBSCRIBED and SWORN to  
before me this 24th  
day of November, 1981

Notary Public

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8112180358 811210  
PDR ADOCK 05000454  
G PDR

NOV 27 1981

Attachment A  
Response to Notice of Violation

Violation

10 CFR 50, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality ... are promptly identified and corrected."

Commonwealth Edison Company Topical Report No. CE 1-A, Revision 9, Section 16, states in part, "A corrective action system will be used to assure that such items... which are adverse to quality and might affect the safe operation of a nuclear generating station are promptly identified and corrected."

Contrary to the above, the licensee had not taken the necessary actions to assure that an identified item of noncompliance, concerning the separation criteria between safety-related and non-safety-related cables, was promptly corrected. This is exemplified by the fact that the appropriate Hatfield procedure addressed in the licensee's correspondence, was not being implemented as of September 24, 1981. The licensee committed to have the procedure implemented by June 1, 1981. (Reference CECO. letter dated May 7, 1981, from Cordell Reed to James G. Keppler.)

Corrective Action and Results Achieved

As stated in the details of the NRC inspection report, Commonwealth Edison issued a letter to Hatfield on September 24, 1981, directing them to implement Procedure Number 10, Class 1E Cable Installation, Revision 10, Issue 2, dated June 8, 1981 with S&L comments immediately.

In reference to the commitment of having the procedure implemented by June 1, 1981, the following sequence of events transpired:

March 24, 1981: Commonwealth Edison transmitted a letter to Hatfield stating that good construction practices are not to bundle Safety Related and Non-Safety Related cables together. It was further stated that if there were instances in which safety related and non-safety related cables were in contact with each other, that Hatfield should notify Commonwealth Edison.

May 5, 1981: Commonwealth Edison transmitted a letter to Hatfield requiring them to revise their procedure(s) to incorporate the requirements of Commonwealth Edison's letter dated March 24, 1981 as expeditiously as possible.

June 8, 1981: Hatfield transmitted their Procedure No. 10, Class 1E Cable Installation, Revision 10, Issue 2, dated June 8, 1981 to Commonwealth Edison for review and approval. The procedure had been revised to incorporate specific cable separation criterion for the installation and inspection of Class 1E cables.

June 9, 1981: Commonwealth Edison's Project Construction Department received letter No. BY6521 from Commonwealth Edison Site Quality Assurance stating that Hatfield Procedure No. 10, Revision 10, Issue 2, dated June 8, 1981 had been reviewed by CECO. QA and by S&L and that "Interim" approval for use was granted. Final approval would be subject to further review by S&L.

June 10, 1981: Commonwealth Edison transmitted to Hatfield their Procedure No. 10, Revision 10, Issue 2, dated June 8, 1981 with the intent that it would be immediately implemented. However, the wrong standard form letter was used to transmit the procedure to Hatfield. Consequently, instead of implementing the procedure, Hatfield intended to revise and resubmit the procedure for approval.

August 7, 1981: S&L transmitted to Commonwealth Edison Hatfield's Procedure No. 10, Revision 10, Issue 2, dated June 8, 1981 with their comments attached, indicating specific cable separation criteria to be followed. S&L indicated that the procedure should be revised as noted and resubmitted, however the contractor could proceed on making revisions as noted.

August 13, 1981: Commonwealth Edison transmitted to Hatfield their Procedure No. 10, Revision 10, Issue 2, dated June 8, 1981 with the S&L procedure review report attached, indicating the specific cable separation criterion to be added to the procedure. The transmittal directed Hatfield to incorporate this criterion into the procedure and resubmit for review and approval.

September 24, 1981: As a result of discussions with Hatfield and the NRC inspector, it was discovered that the wrong transmittal form letter was used on June 10, 1981 and as a result Hatfield never implemented their Procedure 10, Revision 10, Issue 2, dated June 8, 1981.

In view of the above sequence of events, although Commonwealth Edison failed to meet its commitment of having the procedure implemented by June 1, 1981, the failure to meet the commitment was an error caused by using an incorrect standard transmittal form.

The March 24, 1981 letter transmitted to Hatfield clearly indicates immediate action taken by Commonwealth Edison. This is exemplified by the fact that as a result of this letter all previous items of non-compliance identifying the bundling together of safety related and non-safety related cables were corrected and that Hatfield no longer bundled together safety related and non-safety related cables. Prior to June, 1981, no specific cable separation criterion in free air had been addressed.

Hatfield has submitted for review and approval their Procedure No. 10, Revision 11, which incorporates the S&L comments of August 7, 1981 concerning the specific installation and inspection criterion to be used for cable separation. They are currently implementing Procedure No. 10 Revision 10, Issue 2 with these S&L cable separation criterion comments attached, per Commonwealth Edison's transmittal letter of September 24, 1981.

Corrective Action to Avoid Further Noncompliance

A log has been established in the site construction office to facilitate tracking of commitments made to the NRC as a result of I&E Inspections. Use of this log will help detect errors such as the one which resulted in this noncompliance.

Date When Full Compliance Will Be Achieved

Based on the new separation installation and inspection criterion in Hatfield's Procedure No. 10, we intend to have all of the cable separation problems for installed Unit 1, cable, identified by the end of March 1982 and to have corrective action completed for these items by the end of December 1982.

For Unit 2 we intend to have all the cable separation problems for installed cable identified by the end of June 1982 and to have the corrective action completed for these items by the end of March 1983.