

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 454/82-24(DPRP); 455/82-18(DPRP)

Docket Nos. 50-454; 50-455

Licenses No. CPPR-130, CPPR-131

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: Byron Station, Units 1 and 2

Inspection At: Byron, IL

Inspection Conducted: November 30 through December 3, 1982

Inspector: *J. M. Hinds, Jr.*
J. M. Hinds, Jr., Project Inspector
Reactor Projects 1B

12-30-82

Approved By: *D. W. Hayes*
D. W. Hayes, Chief
Reactor Projects Section 1B

1-3-83

Inspection Summary

Inspection on November 30 through December 3, 1982 (Reports No. 454/82-24(DPRP); 455/82-18(DPRP))

Areas Inspected: Routine unannounced safety inspection to review procurement, receiving and storage; IE Circular file response; implementation of house-keeping requirements; and other activities. The inspection involved a total of 32 inspector-hours onsite by one NRC inspector including zero inspector-hours onsite during off-shifts.

Results: Of the four areas inspected, no items of noncompliance were observed in three areas. One item of noncompliance was identified in the other area (inadequate program to control temperature and humidity in storage - Paragraph 3.a; failure to maintain cleanliness in storage - Paragraph 3.b; failure to ensure access in storage - Paragraph 3.c; and failure to control hazardous materials in storage - Paragraph 3.d).

DETAILS

Persons Contacted

Commonwealth Edison Company

*M. Stanish, Construction Quality Assurance Manager
P. Myrda, Quality Assurance Supervisor
R. Westburg, Quality Assurance Staff Assistant
*R. Klingler, Quality Control Supervisor
K. Hansing, Quality Assurance Manager
*R. Tuetkin, Assistant Project Superintendent, PCD
G. Sorensen, Project Construction Superintendent
A. Rosebach, Quality Assurance Inspector

Pittsburg Testing Laboratory

G. Mueller, PTL/CECo Receipt Inspector

Hatfield Electric Company

J. Knoebber, HECO Warehouseman

Hunter Corporation

D. Askeland, Hunter Warehouseman

Nuclear Regulatory Commission

*W. Forney, Senior Resident Inspector
*K. Connaughton, Resident Inspector
J. Norton, Reactor Inspector (Civil)
*D. Hayes, Chief, Reactor Projects 1B

The inspector also contacted and interviewed other licensee and contractor personnel during the course of the inspection.

*Denotes personnel present at the exit meeting.

Functional or Program Areas Inspected

1. Review of Site Procurement Documentation - Class 1E Equipment

The inspector randomly selected part No. 1APO5E identified as 4160 volt switchboard parts, ordered by CECO for Hatfield Electric Company (HECO) on Purchase Order (PO) No. 197410 in accordance with Sargent and Lundy (S&L) Conformed Technical Specification No. 2737.01 and received on Material and Equipment Receiving and Inspection Report (MRR) Nos. 4523, 6149, 6312, and 6534 from the Unit 1 equipment parts list to determine whether equipment procurement specifications include applicable Quality Assurance (QA) and technical requirements identified. The following observations were made:

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- a. The design parameters are suitably specified in the S&L CTS 2737.01 as required.
 - b. Article 108, S&L CTS 2737.01 identified the applicable technical requirements, i.e., Industrial Codes and Standards:
 - ANSI C37.20c-1974 Standard for Switchgear Assembly including Metal Enclosed Bus
 - IEEE 323-1974 Qualifying Class 1E Equipment for Nuclear Power Generating Stations
 - IEE 344-1975 Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations
 - c. The requirements of 10 CFR 21 are applicable in this case and set in place by Change Order No. NU-15, 144-1G dated June 3, 1980 to PO 197410 and remain in effect to date.
 - d. Verification that the supplier of the material is on the approved list of suppliers was accomplished by review of the Approved Bidders List (ABL) which indicates, on page M-00315, Material and Equipment by Type, "Switchgear" (alphabetical), that Westinghouse Electric Corporation (W) Switchgear Division (SD), E. Pittsburg, PA (no number listed) is an approved supplier of this material.
 - e. A review of CECo Audit No. 6-80-276 of September 16 and 17, 1980, report dated September 24, 1980, to "verify the effectiveness of Westinghouse Switchgear Division's Quality Assurance Program" revealed five findings and one observation. Findings and observations were forwarded to W SD on September 26, 1980 by CECo letter BY-5532. W SD response of resolution was forwarded to CECo on November 14, 1980. Acceptance was forwarded to W on November 25, 1980 by CECo letter BY-5690. The audit satisfies the requirement for CECo to audit the vendor's QA program.
 - f. Appropriate QA requirements including protection of the equipment against environmental conditions for long-term storage were verified to be set down in the W QA Manual and submitted to CECo Site Construction QA Department. Requirements were identified as "Indoor Storage of Switchgear," 2737.20.2 of January 11, 1978 Drawing Nos. 3786A11, Sheet 1 to 7, Revision 2 and 437B600 Revision 1.
 - g. The S&L CTS 2737.01, Article 114.12, Certificate of Conformance (COC) submittal, lists the requirements for use. Reviewed COC Medium Voltage (M.V.) 6B in S&L letter dated October 6, 1981 for Project No. 4391-05, Shop Order 01YN017 and 01YN018, Bus No. 141, listing parts, to determine the following.
 - (1) Material properly identified with PO 197411 listed.
 - (2) COC includes certification statement to identify specific procurement requirements met.

- (3) Procurement requirements NOT met are identified by Deviation Notice(s) (when applicable) with copies included.
 - (4) Article 114.12.e, "attested by...responsible for QA function" satisfied by signatures of "Customer Order Engineer" and "Quality Assurance Supervisor."
 - (5) Processing of COC identified in S&L letter dated September 8, 1978, Project Nos. 4391-05 to CECO forwarded Procedure SQ-892, Certificate of Conformance, Revision 0, (E. Pittsburg Plant) of August 18, 1978 satisfies requirement to identify procedure or QA program to be followed.
- h. Reviewed the ABL to verify that the ABL is readily available, identifies the type of component, and qualifies the vendor to supply the material.

No apparent items of noncompliance were identified.

2. Observation of Receipt Inspection Work Activities

The inspector observed and interviewed a CECO receipt inspector in the performance of his duties in CECO Site Storage Warehouse No. 3 assigned to Hunter for the storage of mechanical and piping system components.

Review of receipt inspection package, methods and procedures employed for receiving the observed shipment indicated that the documented records, methods of inspection, handling of shipment, and documenting of findings were performed in accordance with applicable QA requirements.

No apparent items of noncompliance were identified.

3. Site Storage Facilities

The inspector selected two CECO site storage facilities for inspection and, accompanied by CECO personnel, conducted a tour of the warehouses assigned to Hatfield for the storage of electrical material and Hunter, for the storage of mechanical material.

The warehouses were inspected to determine the environmental storage conditions, control of access to storage areas, identification of stored items, and compliance with storage requirements specified in ANSI N45.2.2, Section 6.1.2, Levels of Storage, Section 6.2, Storage Areas, and Section 6.3, Storage Methods. The following findings were observed:

- a. During an inspection tour of the CECO site storage warehouse assigned to Hatfield, an interview with the Hatfield warehouseman revealed that NO system exists to monitor, and control the temperature in the Hatfield warehouse to prevent condensate and corrosion by maintaining a temperature band of 40°F to 140°F as required for facilities housing Level B items. Additionally while inspecting the Hunter facilities it was also determined through interviews with the Hunter warehouseman that NO systems exist to monitor and

control temperature nor humidity as required for Level A items observed stored in the Hunter facility. Failure to provide adequate systems to monitor and control temperature and humidity is considered to be a violation of 10 CFR 50, Appendix B, Criterion XIII and ANSI N45.2.2-1972 and is considered to be an item of noncompliance as described in the Appendix to the report transmittal letter (454/82-24-01a, 455/82-18-01a).

- b. While touring the CECO site storage warehouse assigned to Hunter, the inspector observed accumulations of discarded packaging material including styrofoam fillers and assorted plastic packing bags, soft drink cans, scrap piping material, cigarette butts, wooden packing box pieces, and other miscellaneous debris among the warehouse storage racks. This failure to maintain the required storage area cleanliness levels is considered to be a violation of 10 CFR 50, Appendix B, Criterion XIII and ANSI N45.2.2-1972 and is considered to be an item of noncompliance as described in the appendix to the report transmittal letter (454/82-24-01b; 455/82-18-01b).
- c. In one area of the Hunter warehouse, the inspector attempted to gain access to sections of the reactor vessel reflective insulation for the purpose of verifying ready access for the periodic inspections specified. Due to the methods of arrangement and stacking in this area, the attempted access proved futile. In this configuration routine inspections cannot be performed without excessive handling which would increase the risk of damage. Failure to provide ready access to stored items for periodic inspections is considered to be a violation of 10 CFR 50, Appendix B, Criterion XIII and ANSI N45.2.2-1972 and is considered to be an item of noncompliance as described in the Appendix to the report transmittal letter (454/82-24-01c; 455/82-18-01c).
- d. On the wall adjacent to the office and materials control document file area, in the Hunter warehouse, the inspector observed eight 5-gallon cans of paint in two areas. A plywood box, with cover attached, was marked to indicate the storage of seven 5-gallon cans of paint. In the other area, a single 5-gallon can with appropriate red, diamond shaped, flammability hazard label attached, was noted. Both paint storage areas were in close proximity to important nuclear plant materials. The plywood box does not meet the requirements of a well ventilated area. This failure to control hazardous materials in storage is considered to be a violation of 10 CFR 50, Appendix B, Criterion XIII and ANSI N45.2.2-1972 and is considered to be an item of noncompliance as described in the Appendix to the report transmittal letter (454/82-24-1d; 455/82-18-1d).

Inspection and Enforcement Circulars - (IECs)

(Open) IEC 81-10: "Steam Voiding in the Reactor Coolant System During Decay Heat Removal Cooldown." The licensee's file response indicated that the operating and emergency procedures addressing natural circulation have been prepared incorporating the circular information. Due to other commitments, the inspector was unable to contact cognizant

licensee personnel to review appropriate documentation. This circular has been assigned to the Byron Resident Inspector for closeout.

Plant Tour

The inspector walked through various areas of Units 1 and 2 to observe operations and activities in progress, to inspect the general state of cleanliness, housekeeping and adherence to fire protection rules.

No apparent items of noncompliance or deviations were observed.

Exit Meeting

The inspector met with licensee representatives (denoted under Persons Contacted) at the conclusion of the inspection on December 3, 1982. The inspector summarized the purpose, scope and the findings of the inspection. The licensee acknowledged the findings reported herein.