



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

August 9, 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
I&E Inspection Report Nos.
50-454/82-10 and 50-455/82-07

Reference (a): July 8, 1982 letter from
R. L. Spessard to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection conducted by Messrs. W. L. Forney, C. Ramsey, and J. Ulie on May 1 through June 18, 1982 of activities at Byron Station. During the 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).

As indicated in our response, not all of the events cited are examples of noncompliance. None of the events compromised the effectiveness of preoperational testing. The inspector made the plant management aware of his findings and action was taken to immediately correct the situation. It is our intent to continually improve the quality of our test program. The Resident Inspector has acknowledged an improvement in the conduct of testing activities.

It appears that none of the noncompliances discussed in the Notice of Violation have any safety or environmental significance. We request that the severity level be downgraded from IV to V. We also request an opportunity to meet with regional NRC management to review our response to this Notice of Violation.

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 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.

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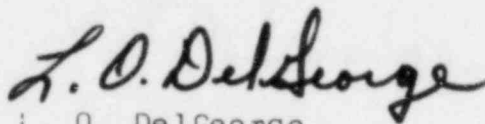
J. G. Keppler

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August 9, 1982

Please address questions regarding this matter to this office.

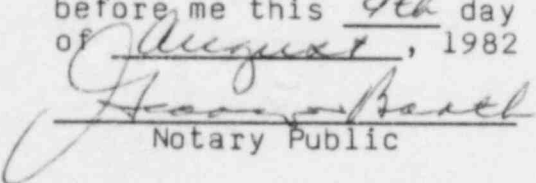
Very truly yours,



L. O. DelGeorge
Director of Nuclear Licensing

TRT/lm

SUBSCRIBED AND SWORN to
before me this 9th day
of August, 1982



Notary Public

4691N

ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

Violation

10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plant states in part:

"XI Test Control.....A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents."

The Byron FSAR, Chapter 17.0, Quality Assurance, states in part:
"Therefore the CE Topical Report CE-1-A, Revision 7 and all subsequent revisions unless otherwise noted in this chapter, is the basis for the Q.A. Program at Byron/Braidwood Station."

Commonwealth Edison Company Topical Report CE-1-A, Quality Assurance Program for Nuclear Generating Stations, Revision 20 dated February 17, 1982, Section 11, states in part: "Preoperational tests which are performed on critical safety Category I equipment are controlled by approved written procedures...."

Byron Station Startup Manual, Revision 8 dated May 3, 1982, Section 3.7 states in part: "Minor and major changes are incorporated in the test procedures and ensure that only properly marked and updated copies or portions of copies are used for testing."

Contrary to the above:

- a) On May 12, 1982, the inspector noted that during the performance of Emergency Diesel 1A testing in accordance with Preoperational Test Procedure 2.22.10 that the procedure copy being utilized by the control board operator did not have a copy of Test Change Request (TCR) #33 and did not have TCR #33 or 34 entered as required by Byron Station Startup Manual, Revision 8.
- b) On May 14, 1982, the inspector noted that during the performance of Safety Injection testing in accordance with Preoperational Test Procedure 2.73.10 that the Test Engineer directed the Instrument Mechanics to install electrical jumpers as required by Step 9.3.2 before placing breaker in test as required by TCR #10.
- c) On May 25, 1982, the inspector noted that during the performance of Emergency Diesel 1B testing in accordance with Preoperational Test Procedure 2.22.10 that the procedure copy being utilized by the control board operator did not have TCR #35 entered as required by the Byron Station Startup manual, Revision 8.

- d) On May 25, 1982, the inspector noted that TCR #5 did not indicate if the change affected procedural intent or whether it was a safety related change and TCR #7 did not indicate whether it was a safety related change as required by Byron Station Startup Manual, Revision 8.
- e) On May 25, 1982, the inspector noted when reviewing data sheets for Emergency Diesel 1A testing on April 23, 1982 in accordance with Preoperational Test Procedure 2.22.10 that data sheet 11.10.18 pages 1-4 were not signed and dated as required and page 5 was missing data for the 6:30 a.m. reading.
- f) On May 25, 1982, the inspector noted when reviewing data sheets for Emergency Diesel 1B testing on May 24-25, 1982, that some data had been recorded in pencil and some data had been written over instead of lining out and initialling and recording new data. Additionally, some data sheets for May 24-25, 1982, were not signed and dated as required.
- g) On May 25, 1982, the inspector noted that the diesel operator in Diesel Generator 1B was not attentive to the test in progress as he was observed approximately 15 feet from the control board, sitting on a tool box, reading a newspaper and the control board operator was approximately 6 feet from the control board, sitting in a chair in a near prone position.
- h) On May 25, 1982, the inspector reviewed computer data of the kilowatt output of Emergency Diesel 1B obtained during the performance of Preoperational Test 2.22.10 and noted many instances where the control board operators allowed the kilowatt output of the generator to exceed the minimum and maximum output requirements of Section 9.28 of the test procedure.
- i) On June 10, 1982, the inspector noted that during the performance of Chemical and Volume Control Testing in accordance with Preoperational Test Procedure 2.18.10 that the control room operator's copy of the procedure did not have TCR's 2 and 12 entered as required and TCR #24 was not properly entered as required.

RESPONSE

Items a), c), and i)

Corrective Action Taken and Results Achieved

In all cases the control room operator's copy had the TCR attached but the change was not indicated in the test procedure. On Preoperational Test Procedure 2.22.10, TCR 33 was attached but was out of sequence with the other TCR's. Action was promptly taken to note the TCR's in the control room operator's copy of the procedure.

Corrective Action Taken to Prevent Further Noncompliance

System Test Engineers will assure that the control room operator's copy of the test procedure has all approved TCR's attached and the changes are noted in the test.

Date When Full Compliance Will Be Achieved

August 6, 1982

Item b)

Corrective Action Taken and Results Achieved

As reported by the Inspector, the System Test Engineer directed the Instrument Mechanic to install electrical jumpers before placing a breaker in a test, thus violating the approved test procedure. This error was realized before any other test steps were initiated. The jumpers were removed and the test continued according to the approved procedure.

Corrective Action Taken to Avoid Further Noncompliance

This event was reviewed with the Technical Staff at a biweekly meeting.

Date When Full Compliance Will Be Achieved

August 6, 1982.

Item d)

We do not agree that this is an example of noncompliance.

The Byron Startup Manual does not require documentation of determinations made regarding the classification of change requests. The form used by the System Test Engineer (STE) contains space for this determination as an aid to the STE in determining what approvals are required. In both cases cited, the correct approvals had been obtained.

RESPONSE (Cont'd)

Item e)

Missing Data

We do not agree that this is an example of noncompliance.

No diesel test was in progress at 6:30 a.m. on April 23, 1982.

Emergency diesel 1A was being tested at 6:30 p.m. on April 21, 1982. The diesel tripped at approximately 6:30 p.m. on April 21, 1982. The data for that hour had not all been recorded when the trip occurred.

Signing and Dating Data Sheets

Corrective Action Taken and Results Achieved

The data sheets in question were reviewed for completeness, signed and dated after the omission was brought to the Station's attention.

Corrective Action Taken to Avoid Further Noncompliance

System Test Engineers will assure that data sheets are signed and dated.

Date When Full Compliance Will Be Achieved

August 20, 1982.

Item f)

Data Legibility

Corrective Action Taken and Results Achieved

The data which was either written over or scratched out was reviewed. After notification by the inspector, all future data errors were corrected by lining out and initialing. See Item e) response with regard to data sheets not signed and dated as required.

Corrective Action Taken to Avoid Further Noncompliance

The System Test Engineers and their supervisors will be reminded of the proper method of correcting data.

Date When Full Compliance Will Be Achieved

August 20, 1982

RESPONSE (Cont'd)

Black Ink

We do not agree that this is an item of non compliance.

The Startup Manual specifies that "data should be recorded in black ink". It was our intent that black ink was desired but not required to ensure legibility of data for reproducibility during microfilming. Because of concerns expressed by the inspector, photo copies were made of data taken in pencil to assure permanence of data entries.

Item g)

Corrective Action Taken and Results Achieved

When the Inspector notified the Assistant Superintendent for Operations of this situation the Shift Engineer was immediately notified. He instructed the operator to stand up and pay attention to the control board indicators.

Corrective Action Taken to Avoid Further Noncompliance

As stated in the June 15, 1982 response to violation, Inspection Report No. 50-454/82-07, the Station has increased the awareness of operators with regards to the testing program. The May 25, 1982 inspection was made prior to the full implementation of the methods to increase this awareness. Program changes included:

1. Having a designated Shift Supervisor in charge of the control room.
2. Test briefings with the Shift Engineer or his designee, System Test Engineer, Operator and others involved in a particular test prior to the start of testing for that day.
3. Revision of a Standing Order to effect better operating practices in regards to log keeping.
4. An Operating Engineer is assigned responsibility for monitoring operating activities regarding the conduct of shift operations.
5. Meetings are held with each shift to inform each individual of the importance of good communications and awareness in improving the quality of the Test Program.
6. Shift relief and turnover guidelines were written to upgrade the shift turnovers.

RESPONSE (Cont'd g)

7. Forms were developed to ensure better operator awareness of testing activities pertinent to the daily test programs so that they are aware of special precautions, initial conditions and essential parameters.

Date When Full Compliance Will Be Achieved

July 1, 1982.

Item h)

Corrective Action Taken and the Results Achieved

During the testing of emergency diesel 1B the System Test Engineer noticed load swings outside the specified band. He documented this with a Testing Deficiency report and Test Change Request. The load band was altered in accordance with procedures in the Startup Manual. During the test the load on the diesel generator was outside the altered band for approximately five minutes during the 22 hour test. The impact of this testing deficiency will be evaluated during the review of this preoperational test.

Note: The process computer was utilized for trending during this test and was not used for determining acceptance. Later reverification of this input indicated the computer reading was on the high end of the 1% accuracy (66MW).

Corrective Action Taken to Avoid Further Noncompliance

System Test Engineers and their supervisors will be reminded of the requirement for initiation of a TCR when a particular test condition cannot be established during a preoperational test.

Date When Full Compliance Will Be Achieved

August 20, 1982.