



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

August 23, 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

- References (a): July 8, 1982, letter from  
R. L. Spessard to Cordell Reed.
- (b): August 9, 1982, letter from  
L. O. DelGeorge to J. G. Keppler.

Dear Mr. Keppler:

This is to provide supplemental information regarding actions discussed in reference (b) to correct items of noncompliance at Byron Station identified in reference (a).

We have recently been made aware of additional details of the noncompliance cited in reference (a). Upon consideration of this information we conclude that all of the events cited were properly identified as items of noncompliance. Revised responses to portions of the Notice of Violation are contained in Attachment A. The management meeting contemplated in reference (b) is no longer requested.

In addition to the corrective actions taken in response to the specific events cited by the inspector we have also increased our efforts to improve the general quality of the preoperational testing program. The Byron Station Startup Manual is being reviewed at all levels of station management to clarify the requirements and resolve programmatic deficiencies of the type cited. Necessary changes will be implemented in a timely manner.

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.

8209080109 820901  
PDR ADOCK 05000454  
Q PDR

AUG 26 1982

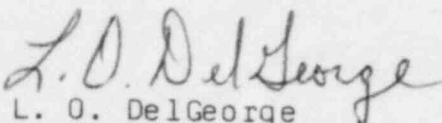
J. G. Keppler

- 2 -

August 23, 1982

Please address further questions regarding this matter to this office.

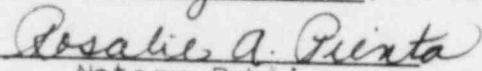
Very truly yours,

  
L. O. DelGeorge  
Director of Nuclear Licensing

TRT/lm

Attachment

SUBSCRIBED and SWORN to  
before me this 25th day  
of August, 1982

  
Notary Public

4826N

ATTACHMENT A

Supplemental Response to Notice of Violation

Violation 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.

Corrective Action Taken and Results Achieved

The correct approvals for the TCR's had been obtained at the time of the inspection.

Corrective Action Taken to Avoid Further Noncompliance

A change to the Byron Startup Manual will be made to incorporate a requirement to utilize the Test Change Request Form. Usage of the TCR's will be started immediately.

Date When Full Compliance Will Be Achieved

August 20, 1982.

Violation E

On May 25, 1982, the inspector noted when reviewing data sheets for Emergency Diesel IA testing on April 23, 1982 in accordance with Preoperational Test Procedure 2.22.10 that data sheet 11.10.18 pages 1-2 were not signed and dated as required and page 5 was missing data for the 6:30 a.m. reading.

Corrective Action Taken and Results Achieved

It was verified that the 6:30 p.m. data entry was incomplete because the diesel had tripped during data taking.

Corrective Action Taken to Avoid Further Noncompliance

In the future all data blanks will be filled out or indicated as being not applicable. This will eliminate possible confusion in the event data taking is interrupted for some reason. This has been reviewed with System Test Engineers at a Tech Staff meeting.

Date When Full Compliance Will Be Achieved

August 20, 1982.

Violation F (Black Ink)

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.

Corrective Action Taken and Results Achieved

Date legibility was verified and photocopies of the form were made to assure permanence of data entries.

Corrective Action Taken to Avoid Further Noncompliance

The proper method of recording and correcting data has been reviewed with the appropriate station personnel.

Date When Full Compliance Will Be Achieved

August 20, 1982.

Violation 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.

Additional Corrective Action Taken and Results Achieved

The computer sheets referred to will be utilized for the evaluation of the diesel generator test results of concern.

Corrective Action Taken to Avoid Further Noncompliance

Whenever computer data is to be utilized to evaluate the test performance, the appropriate data sheets will be included in the test package.

Date When Full Compliance Will Be Achieved

August 20, 1982.