

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-454/82-16(DETP); 50-455/82-11(DETP)

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 Site, Byron, IL

Inspection Conducted: September 1-2, 1982

Inspectors: *J. M. Peschel*
J. M. Peschel

9/20/82

Approved By: *F. C. Hawkins*
F. C. Hawkins, Chief
Management Programs Section

9/20/82

Inspection Summary

Inspection on September 1-2, 1982 (Reports No. 50-454/82-16(DETP); 50-455/82-11(DETP))

Areas Inspected: Licensee action on previously identified unresolved items, open items, and noncompliances. The inspection involved a total of 14 inspector-hours onsite.

Results: Of the areas inspected, one apparent item of noncompliance was identified (Criterion VI - failure to distribute controlled documents - Section 2.a.).

DETAILS

1. Persons Contacted

Commonwealth Edison Company (CECo)

*R. Tuetken, Assistant Project Superintendent
*M. Stanish, Quality Assurance Superintendent
*P. Myrda, Quality Assurance Supervisor
*R. Klingler, Quality Control Supervisor
*H. Kaczmarek, Quality Engineer
W. Wolber, Quality Engineer
P. Toney, Engineering Assistant

Hatfield Electric Company (HECo)

*J. Buchanan, QA/QC Manager

Hunter Corporation

R. Fry, Lead Auditor in Training

Powers-Azco-Pope (PAP)

R. Larkin, Quality Assurance Manager

Johnson Controls, Inc. (JCI)

J. Shroff, Quality Control Inspector

Pittsburgh Testing Laboratory (PTL)

M. Tallent, Site Manager

Nuclear Regulatory Commission (NRC)

W. Forney, Senior Resident Inspector

*Denotes those attending exit meeting on September 2, 1982.

2. Licensee Action on Previous Inspection Findings

- a. (Closed) Noncompliance (454/82-05-01a; 455/82-04-01a): Failure of Hatfield Electric Company (HECo) and Powers-Azco-Pope (PAP) to show adequate separation between QA and production in their respective QA Manuals.

Revision 11 of the HECo QA Manual was reviewed and found to be acceptable. The HECo QA/QC Manager reports to the President of HECo (located offsite) and communicates with the Vice-President (located onsite). Revision 0 of the Second Edition of the PAP QA Manual was reviewed and found to be acceptable. The PAP QA Manager reports offsite to a Joint Venture Committee and communicates with the Project Manager (located onsite).

Revision 11 to the HECo QA Manual was approved by the licensee on June 10, 1982 and a letter was sent to HECo annotating this approval by the Project Engineer. On September 1, 1982, the controlled copy of the HECo QA Manual in the possession of the HECo QA Supervisor was reviewed by the inspector and it did not contain Revision 11. As a result, distribution of Revision 11 was made from the HECo corporate office to the site at approximately 3:00 p.m. on September 2, 1982.

This failure to assure that the HECo QA Manual was distributed to Byron field personnel for use is considered an item of non-compliance with 10 CFR 50, Appendix B, Criterion VI.
(50-454/82-16-01; 50-455/82-11-01)

- b. (Closed) Unresolved Item (454/82-05-02; 455/82-04-02): The QA oversight functions of Johnson Controls, Inc. (JCI) and Pittsburgh Testing Laboratory (PTL) were not determined.

The organization of JCI was reviewed. The site Quality Assurance Manager was shown to have only QA related duties and the auditing of JCI activities is conducted by corporate office personnel. Revision 1 of the Byron Addenda to the JCI QA Manual was reviewed and found to be acceptable.

PTL provides coverage of its second shift activities through the use of unscheduled surveillances. A review was made of the surveillances conducted in the last year and no deficiencies were noted. The licensee also provides surveillance of PTL off-shift activities. Randomly selected surveillance's, conducted by CECO, were selected for review. No deficiencies were identified.

- c. (Closed) Open Item (454/82-05-03; 455/82-04-03): The licensee's QA staffing and Management Policy Statement required further clarification.

A review was made of the licensee's present QA staffing and plans for future staffing. The QA staff has been increased to 19 personnel and all personnel are being trained in an expeditious manner. Further review was made of the Topical Report and the Quality Assurance Manual and it was concluded that the licensee is dedicated to meeting all the requirements of 10 CFR 50, Appendix B and the ASME Code as stated in the Quality Assurance Manual. We have no further questions regarding this matter at this time.

- d. (Closed) Noncompliance (454/82-05-01b; 455/82-04-01b): Failure of the licensee to provide independence between the Project Construction Department and the contractors' Quality Assurance Departments.

A review was made of the May 5, 1982 memo from Project Construction concerning the new promotion policy for cost reimbursable QA/QC personnel. The offsite QA/QC organization of the contractor will be responsible for the administration and approval of cost reimbursable QA/QC personnel raises/promotions.

- e. (Closed) Open Item (454/82-05-04; 455/82-04-04): The Project Construction Department (PCD) appeared to be involved in QA activities.

A review of the licensee's QA Manual verified that adequate interface controls do exist and that the relationships between the Construction Department, QA, and the contractors are properly explained. In the future, courtesy copies of correspondence between PCD and the contractors which relate to Quality Assurance will be provided to the licensee QA Superintendent. The QA Superintendent will also be involved in discussion between PCD and contractors involving QA activities.

- f. (Closed) Noncompliance (454/82-05-01c; 455/82-05-01c): Failure of HECO and JCI to reflect their QA organizations in their QA Manuals.

Revision 11 of the HECO QA Manual was reviewed and the current HECO QA organization is reflected. Revision 1 of the Byron Addenda to the JCI QA Manual was reviewed and the current JCI QA organization is reflected.

- g. (Closed) Noncompliance (454/82-05-05; 455/82-04-05): Failure of Midway Industrial Contractors to adequately protect quality records.

A tour was made of all records storage areas. Adequate records storage security was observed. Surveillances conducted by the licensee were reviewed and no deficiencies were identified.

- h. (Closed) Unresolved Item (454/82-05-06; 455/82-04-06): Records storage vaults contained holes around conduit penetrations. A tour was made of all quality record storage facilities and all penetrations have been sealed.

On September 1, 1982 at approximately 3:00 p.m. the relative humidity in the licensee's records storage vault read 57%. The vault is used to store radiographs. At the inspector's request, the licensee contacted the manufacturer of the radiograph film (KODAK) to obtain the recommendations for film storage as required by ANSI N45.2.9. The licensee obtained a relative humidity band of 30-50% with a 60% peak during a telephone conversation with KODAK personnel. The licensee has agreed to obtain, from KODAK, written recommendations for storage of radiographs, including definitions of peak relative humidity and peak temperatures, to include durations. Pending receipt of the written recommendations from KODAK, the storage of radiographs is considered an unresolved item (50-454/82-16-02; 50-455/82-11-02).

- i. (Closed) Open Item (454/82-05-07; 455/82-04-07): Failure of the licensee to document the reason for missed surveillances.

A review was made of the monthly surveillance reports from the site QA Department to the Corporate QA Organization. The report format has been revised and reflects the surveillances missed, the reason they were not performed, and any action to be taken.

- j. (Closed) Noncompliance (454/82-05-08; 455/82-04-08): Failure of JCI and Hunter Corporation to control the issuance of drawings.

A review was made of the surveillances of drawing control activities performed by the licensee at JCI and Hunter Corporation. No deficiencies were noted. No out of date drawings were noted in tours of JCI and Hunter facilities.

- k. (Closed) Noncompliance (454/82-05-09a; 455/82-04-09a): Failure of HEC0 and PAP to conduct activities affecting quality in accordance with approved procedures.

Revision 9 of HEC0 Procedure No. 6 was reviewed to verify that the Discrepancy Report form had been included in the procedure. The Discrepancy Report log was also reviewed and no deficiencies were noted. Revision 9 to PAP Procedure QC-4 was reviewed to verify that the Fabrication/Installation Surveillance Report form had been included in the procedure. No deficiencies were noted.

- l. (Closed) Noncompliance (454/82-05-10; 455/82-04-10): Failure of the licensee and contractor to include, in their audit reports, a complete list of persons contacted and an evaluation statement regarding the effectiveness of the audited program elements.

The April 14, 1982 directive to all site contractors' QA Managers was reviewed to verify it addressed the inclusion of the required elements. A review was made of audit reports of the licensee, Hunter Corporation, and PAP. No deficiencies were noted.

- m. (Closed) Noncompliance (454/82-04-11a; 455/82-04-11a): Failure of HEC0 and PAP to control torque wrenches in accordance with procedures.

A review was made of the implementation of measuring and test equipment control at HEC0 and PAP. All equipment reviewed was controlled in accordance with procedures.

- n. (Closed) Noncompliance (454/82-05-11b; 455/82-04-11b): Failure of the licensee to maintain warehouses No. 1 and 5 in accordance with ANSI N45.2.2.

Tours were made of the licensee's warehouses and no housekeeping or storage problems were noted.

- o. (Closed) Noncompliance (454/82-05-11c; 455/82-04-11c): Failure of PAP to control rejected material in accordance with their procedure.

An inspection was made of the methods that PAP uses to control rejected material. The methods were in accordance with PAP Procedure No. FP-3.

Unresolved Items

Unresolved Items are matters about which more information is required in order to ascertain whether they are acceptable items, Items of Noncompliance or Deviations. An Unresolved Item disclosed during the inspection is discussed in Paragraph 2.h.

Exit Interview

The inspector met with licensee representatives denoted in Paragraph 1 at the conclusion of the inspection on September 2, 1982. The inspector summarized the purpose and the scope of the inspection and the findings.