U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-454/82-15(DPRP); 50-455/82-10(DPRP)

Docket No. 50-454; 50-455

License 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 Station, Byron, IL

Inspection Conducted: July 12 - August 31, 1982

Inspectors: W. L. Forney

K. Connaughton

Approved By: D. W. Hayes, Chief

Reactor Projects Section 1B

9-20-82

Inspection Summary

Inspection on July 12 - August 31, 1982 (Report No. 50-454/82-15(DPRP); 50-455/82-10(DPRP))

Areas Inspected: Routine unannounced safety inspection to review preoperational test activities; I.E. Circulars, plant procedures review; follow-up of previously identified items and other activities. The inspection involved a total of 150 inspector-hours onsite by three NRC inspectors including 14 inspector-hours onsite during off shifts.

Results: Of the five areas inspected no apparent items of noncompliance were identified.

DETAILS

1. Persons Contacted

Commonwealth Edison Company

- V. I. Schlosser, Project Manager
- G. Sorensen, Project Construction Superintendent
- *R. Tuetken, Assistant Project Superintendent, PCD
- R. B. Klingler, Quality Control Supervisor
- J. Binder, Lead Electrical Engineer, PCD
- *C. Tomashek, Lead Startup Engineer
- *M. Stanish, Construction Quality Assurance Manager
- *R. Querio, Station Superintendent
- *R. Ward, Station Assistant Superintendent for Administration & Support
- R. Pleniewicz, Station Assistant Superintendent for Operations
- *L. Sues, Station Assistant Superintendent for Maintenance
- *R. Blythe, Operating
- *D. St. Clair, Technical Staff Supervisor
- A. A. Jaras, Project O.A.D. Supervisor
- F. A. Hornbeak, Assistant Technical Staff Supervisor, Startup
- A. C. Chomacke, Assistant Technical Staff Supervisor
- J. R. VanLaere, Rad Chem
- *P. Nodzenski, Quality Assurance
- T. P. Joyce, Operating Engineer
- W. Burkamper, QA Supervisor
- *T. Schuster, Technical Staff

*Denotes personnel at exit interview.

2. Preoperational Test Program

- a. The inspectors observed portions of the performance retest of Instrument and Control Power (Inverter and Motor-Generator Sets) Test 2.046.10. The inspectors observed briefings, installation and calibration of test equipment, observation of precautions, documentation of results and unusual events/deficiencies. No apparent items of noncompliance were observed.
- b. The inspectors observed portions of the performance test of Component Cooling (Reactor and Support) Test 2.10.10. The inspectors observed briefings, installation and calibration of test equipment, observation of precautions, documentation of results and unusual events/deficiencies. No apparent items of noncompliance were observed.
- c. The inspectors observed portions of the performance test of Safety Related Auxiliary Power (480V) Test 2.05.10. The inspectors observed briefings, installation and calibration of test equipment, observation of precautions, documentation of results and unusual events/deficiencies. No apparent items of noncompliance were observed.

d. The inspectors observed portions of the performance test of Boron Thermal Regeneration Test 2.08.10. The inspectors observed briefings, installation and calibration of test equipment, observation of precautions, documentation of results and unusual events/ deficiencies.

The inspectors observed during performance of testing that the method of determining valve stroke times would not always ensure proper timing. The inspector observations were discussed with the test engineer, technical staff supervision and plant management. The Technical Staff Supervisor issued a memorandum providing a standard method of valve stroke time to be used by test engineers. Review of this memorandum by the inspector indicated that proper guidance had not been identified for valves with minimum stroke time requirements. The memorandum was subsequently revised and provided to the inspectors for review. Additionally, the technical staff supervisor directed a review be made of all previously timed valves to ensure proper valve timing. The inspector has no further concerns in this area. Adequacy of valve timing will be verified during review of completed test procedures as they are provided to the inspectors and monitored during subsequent test observations.

The inspectors observed during performance of testing that some isolation valves for air supply to air operated valves did not have blue "Pre-Op" tape affixed as required by the Byron Startup Manual. It was also noted that the test engineer determined some valves were not in the required full open position. This item is considered Open (454/82-15-01).

- e. The inspectors reviewed test results for completed portions of preoperational Test 2.24.10, Diesel Fuel Oil Emergency Diesels to verify that test prerequisites and system initial conditions were satisfied; acceptance criterion were met or that deficiencies were documented and retesting requirements identified. Pending completion of sections 9.4, 9.5, 9.8 and resolution of unresolved deficiencies, this is an Open Item (50-454/82-15-02).
- f. The inspectors noted during meetings with plant management regarding the CECO response (August 9, 1982 letter from L. O. DelGeorge to James G. Keppler) that the Byron Startup Manual did not provide reference to a specific form to be used to document test change requests to preoperational test procedures. Byron Startup Manual, Revision 10 issued July 24, 1982 was issued to provide a specific form. The inspectors has no further concerns in this area.
- g. The inspectors noted during observation of testing activities that electrical jumpers were being installed/removed and/or leads were being lifted/replaced without adequate verification of the performance of these activities. The inspector reviewed his concerns with plant management. Subsequent to these dis-

cussions guidance was issued on August 19, 1982 delineating the requirements for proper documentation of these activities. The inspector has no further concerns in this area.

h. The inspectors noted during review of Licensee file response(s) to circulars that some actions identified in the file response(s) were not being tracked by the Licensee on the Commitment Action Item Record (CAIR) system. The inspector concerns were discussed with plant management. Plant management committed to perform a review of responses to I.E. Circulars and Bulletins and to add all currently outstanding actions to the CAIR System. Pending receipt of verification of completion of this review from plant management, this item is considered Open Inspection Item (454/82-15-03; 455/82-10-01).

3. Inspection and Enforcement Circulars

IEC 80-02 "Nuclear Power Plant Staff Work Hours"

The Licensee's file response indicates a corporate policy and guidelines for an administrative procedure exist which meet the guidelines setforth in the circular. This circular is closed.

IEC 80-13 "Grid Strap Damage in Westinghouse Fuel Assemblies"

The Licensee's file response indicated the information provided in the circular would be considered when preparing Byron Site fuel loading procedures. However, the inspectors determined through interview of personnel responses for procedure preparation that they were unaware of the circular. This item is considered open pending further review.

IEC 80-15 "Loss of Reactor Coolant Pump Cooling and Natural Circulation Cooldown"

The Licensee's file response does not adequately address the guidelines setforth in the circular. Recommended Action 1 was to disseminate the information to all licensed operating personnel; however, the response does not indicate the required information would be included in operator training. Recommended Actions 2 and 3 will be verified by inspector review of operating procedures. The Licensee's review of recommended Actions 4 and 5 indicate no action is required. This circular shall remain open pending receipt of file information for Action 1.

IEC 80-16 "Operational Deficiencies in Rosemont Model 510DY Trip Units and Model 1.52 Pressure Transmitters"

> The Licensee's file response indicates none of the subject trip units or pressure transmitters are to be furnished to the Byron site. This circular is considered to be closed.

IEC 80-18 "10 CFR 50.59 Safety Evaluations for Changes to Radioactive Waste Treatment Systems"

The Licensee's file response for the Byron site does not document the stations review to determined that the specific criteria discussed in the circular are contained in site procedures. This circular is open pending receipt of file information that documents a satisfactory review.

IEC 76-02 "Relay Failures - Westinghouse BF (ac) and BFD (dc) Relays"

The Licensee's file response states that reviews of Byron Station NSSS drawings and plant specifications were conducted and it was verified that the subject relays had not been specified for any safety related system. Furthermore, each vendor of safety related electrical equipment would be notified that BF or BFD relays will not be acceptable. This circular is closed.

IEC 76-05 "Hydraulic Shocks"

The Licensee's file response indicates that the snubbers discussed in this circular are not incorporated in the Byron Station design. This circular is closed.

4. Plant Procedure Review

The inspectors verified administrative controls have been established for the review, approval, and periodic updating of procedures, that responsibilities have been assigned in writing to assure that the procedures will be prepared, reviewed, updated and approved as required, and that standing orders are administratively controlled.

The inspectors had a concern that the plant procedures for control of Daily Orders (BAP 300-3) and Standing Orders (BAP 1500-2) did not provide adequate controls limiting their scope, and did not require that all shift supervisory personnel would read and acknowledge their content. Plant management stated the procedures would be modified as required. Pending verification of the required procedural changes this item is considered Open (454/82-15-04; 455/82-10-02.

5. Follow-up of Previously Identified Items

1. Unresolved Item 454/82-10-04 - "Damage to Shock Arrestors"

The inspectors reviewed information provided by letter which contained the results, corrective action and commitments established as a result of CECO Quality Assurance Audit. This item is considered closed.

2. Open Items 454/82-03-01; 455/82-02-01 - "Startup Manual did not ensure all information provided to the startup group on a

deficiency form would receive a deficiency number and become a part of the official records".

The inspectors reviewed Byron Startup Manual Revision 10 and determined the manual currently provides for proper identification and recording of deficient conditions. This item is considered closed.

6. Exit Interview

The inspectors met with Licensee representatives (denoted under Persons Contacted) at the conclusion of the inspection on August 31, 1982. The inspector summarized the scope and findings of the inspection. The Licensee acknowledged the findings reported herein.