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

November 24, 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 Structural Steel Bolting Inspections NRC Docket Nos. 50-454 and 50-455

Dear Mr. Keppler:

On October 21, 1982 Commonwealth Edison Company notified Mr. H. Wescott of your office of a potential deficiency reportable pursuant to 10CFR50.55(e) regarding inspection records for structural steel bolted connections at Byron Station. For your tracking purposes, this deficiency is numbered 82-08. This is an interim report. The final report will be submitted by January 15, 1983.

Description of Deficiency

During a review of structural steel bolting inspection records for the auxiliary building and the river screenhouse, it was determined that inspection records were not available for some of the high strength bolted connections. Specification requirements dictated testing a minimum of 10% of the bolts in each connection. Records are not available for inspection of 55.9% of the high strength bolted connections in the auxiliary building and 49% of those connections in the river screenhouse. The lack of records was caused by a failure to establish an accountability system to indicate the status of inspections completed on the part of one contractor. Adequate records exist for inspection of the bolted structural connections in the containment buildings.

Analysis of Safety Implications

The lack of inspection records has, of itself, no safety implications. All of the bolts were originally installed and torqued in accordance with approved procedures. The safety implications of undetected deficiencies in bolt torquing could only be established with a case-by-case analysis of the as-found conditions.

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Corrective Action Taken

A statistical sampling plan has been established to reinspect the high strength bolted connections. This reinspection is to be performed by the site independent testing contractor in accordance with an approved reinspection procedure. An engineering analysis of the results will then be performed to determine the acceptability of the results.

Due to the research involved to define the scope of the potential deficiency and the steps and time required to complete the inspection program and the final analysis, the final report could not be completed within the 30-day period. At this time, the sampling program is approximately 30% complete. It is expected that a complete report will be submitted by January 15, 1983.

Please direct further questions regarding this matter to this office.

Very truly yours,

T.R.T.Am

T. R. Tramm Nuclear Licensing Administrator

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