



Commonwealth Edison

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Address Reply to: Post Office Box 767
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October 18, 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 No.
50-454/82-12

Reference (a): September 10, 1982, letter from
C. E. Norelius to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the report of an inspection conducted by Messrs. M. A. Ring and D. L. Robinson during June 1982 of activities at Byron Station. During that inspection certain activities were identified as not complying with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation appended to reference (a).

It is requested that the severity level assigned to Violation 1 be reviewed. The failure to document our evaluation has no safety significance. This should have been a Severity Level V 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 and contractor employees and consultants. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address further question regarding this matter to this office.

Very truly yours,

L. O. DelGeorge
L. O. DelGeorge

Director of Nuclear Licensing

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Attachment

SUBSCRIBED and SWORN to
before me this 18th day
of October, 1982

Rosalie A. Prieta
Notary Public

OCT 19 1982

ATTACHMENT A

Response to Notice of Violation

VIOLATION 1

10 CFR 50, Appendix B, Criterion XVI states, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions.... and nonconformances are promptly identified and corrected.... the measures shall assure that the cause of the condition is determined.... The identification of the significant condition adverse to quality, the cause of the condition..., shall be documented and reported to appropriate levels of management."

The Commonwealth Edison Company Quality Assurance Manual, Q.P. No. 15-2, paragraph 5.1.5 states the following: "The Site Construction Superintendent or Project Engineer and/or the applicable Project Engineering or Station Nuclear Engineering Project Engineer will have an evaluation conducted of the factors involving each identified, or vendor or outside organization reported, deficiency and defect to determine if it constitutes a (1) reportable deficiency or (2) a defect. The evaluation must be documented by the cognizant Engineer.

Contrary the above:

Following the 1A Emergency Diesel Generator crankcase explosion on March 6, 1982, the licensee did not document their evaluation of the event, and at the time of the inspection had not determined the cause of the explosion, even though the licensee had determined that the event was not reportable per 10 CFR 50.55(e).

Corrective Action Taken and Results Achieved

Administrative procedures were revised to include the use of a new form which is to be used for communicating test problems encountered by the operating staff to the construction staff and the engineering staff for evaluation as potentially reportable deficiencies. The crankcase explosion was the first event to be documented using this form. The evaluation performed by engineering personnel resulted in the determination that this event was not reportable. The root cause of the failure was never determined conclusively but no evidence of a generic problem was found. It is presumed that this was a random mechanical failure. Extensive repairs were not required.

Corrective Action Taken to Avoid Further Noncompliance

The BAP-1250 procedure described above will be used to assure that test problems are properly evaluated for reportability. These evaluations will also be better documented. A checklist evaluation form has also been developed to provide the basis for a standardized evaluation process for determining 50.55(e) reportability and to provide a record of this evaluation. In using this checklist

cognizant personnel will answer yes/no questions to evaluate both the safety impact and significance of construction deficiencies. When used, the completed form will be included with the appropriate reporting system record (i.e.: Nonconformance Report, Preop Test Deficiency, or CECo Audit Report). Performance deficiencies in preop and startup test reports will also be evaluated by engineering personnel using the criteria established in the forms. Appropriate written instructions will control the use of the evaluation forms. If this system works satisfactorily, consideration will be given to implementation at other CECo construction sites.

Date When Full Compliance Will Be Achieved

The checklist evaluation form will be in trial use by October 27, 1982. Appropriate written instructions will be implemented by December 1, 1982.

VIOLATION 2

10 CFR 50, Appendix B, Criterion V states, "Activities affecting quality shall be prescribed by documented instructions, procedures.... and shall, be accomplished in accordance with these instructions, procedures...."

10 CFR 50, Appendix B, Criterion XV states, in part, that nonconforming items shall be repaired or reworked in accordance with documented procedures.

Chapter 7 of the Startup Test Manual states in part that if a system has been turned over for test and requires maintenance or repair, the Project Construction Department will document the work by an Out-Of-Service Request, CAR, or deficiency.

Production instruction No. 1-3-A-1 states, in part, that Out-Of-Service cards are provided for holding equipment out of service for the protection of people or equipment and that when Generating Station equipment is to be taken out of service, Out-Of-Service cards must be placed on the main switch, main valve, and other devices which will isolate the equipment.

Contrary to the above, procedures were not followed and a reactor coolant pump motor upper bearing cooling water outlet isolation valve, 1CC9493A, was reworked without Out-Of-Service tagging and without the knowledge or concurrence of the Systems Test Engineer on June 25, 1982.

Corrective Action Taken and Results Achieved

This isolated violation of the Out-Of-Service procedure was reviewed with the craft supervision and workers involved. The work performed was reviewed to insure that the proper installation documentation had been completed.

Corrective Action Taken to Avoid Further Noncompliance

Craft personnel and supervisors were reinstructed to obtain outages from the Project Construction Department prior to the performances of work on systems under Re-entry Control. These Outages on equipment are needed for the following reasons:

1. To prevent injury to personnel
2. To prevent damage to equipment
3. To provide notification to Project Construction and Technical Staff personnel that work needs to be performed on a system under re-entry control. They in turn initiate proper documentation (deficiency or CAR) to track the completion and retest of the affected portion of the system.

Date When Full Compliance Will Be Achieved

July 9, 1982.

VIOLATION 3

10 CFR 50, Appendix B, Criterion XV states, "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include...procedures for identification, documentation...and notification to affected organizations."

Contrary to the above, procedures established by the Startup Test Manual were insufficient to ensure proper identification and documentation of nonconforming materials, parts, or components as evidenced by work performed on a reactor coolant pump motor upper bearing cooling water outlet isolation valve, ICC9493A, on June 25, 1982 and on penetration cooling check valves, ICC060 and ICC061, without deficiency documentation and without the concurrence of the of the Systems Test Engineer.

Corrective Action Taken and Results Achieved

The System Test Engineer was notified of the work and a deficiency was written. The work was completed before testing was resumed.

Corrective Action Taken to Avoid Further Noncompliance

Revision 9 to the Byron Startup Manual was written to clarify documentation required for work performed after Turnover for Test.

Date When Full Compliance Will Be Achieved

July 20, 1982.