

July 1, 1994

Docket No. 50-454
Docket No. 50-455

Commonwealth Edison Company
ATTN: Mr. K. Graesser
Site Vice President
Byron Nuclear Power Station
4450 North German Church Road
Byron, IL 61010

Dear Mr. Graesser:

This letter refers to the engineering and technical support inspection conducted by Isa T. Yin, George D. Replogle, and Ronald A. Langstaff, of this office on May 9 - 27, 1994. The inspection included a review of activities authorized for your Byron Nuclear Power Station, Units 1 and 2. At the conclusion of the inspection, the findings were discussed with your staff at the site on May 27, 1994.

The inspection focused on your control and implementation of plant design changes and corrective actions. The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

The inspection concluded that your corrective actions to address design deficiencies with 16 auxiliary feedwater to steam generator isolation valves (AF-013s) were not prompt and that the cause of the September, 1993 failures was not determined. At the time compensatory measures were invoked in September, 1990, for the deficient AF-013 valves, testing was not performed which demonstrated that manual functions of the AF-013 valves and the auxiliary feedwater flow control valves (AF-005s) could perform satisfactorily in service. In addition, problems were identified with emergency operating procedures (EOPs) which should have been identified and addressed during the verification and validation portion of your EOP program. Although none of the problems identified would have prevented a procedure from being accomplished, the problems are of concern because they could cause confusion and delay while responding to an accident.

Other weaknesses identified included inadequate control of a contractor performed piping stress report, inadequate technical review of the stress report and an inadequate engineering evaluation for a temporary alteration. These weaknesses were attributed to weak technical audits and surveillances conducted in the past.

During this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice).

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You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specified actions taken and any additional actions you plan to prevent recurrence. We also request that you inform us of your plans to provide assurance that your EOPs do not have similar problems which could cause confusion and delay during a plant accident or event. After reviewing your response to this Notice, including your proposed corrective actions and the result of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, its enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

original signed by

Mark A. Ring, Chief
Operations Branch

Enclosures:

1. Notice of Violations
2. Inspection Reports
No. 50-454/94010(DRS)
No. 50-455/94010(DRS)

See Attached Distribution

RIII
Yin/cg
06/27/94

RIII
Replegle
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Langstaff
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B. Burgess
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cc w/enclosures:

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D. Brindle, Regulatory Assurance
Supervisor
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Services Manager
OC/LFDCB
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