

MAR 29 1991

NOTICE OF VIOLATION

Commonwealth Edison Company  
Byron Nuclear Station

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

As a result of the inspection conducted from February 11, 1991 through March 22, 1991, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1990), the following violation was identified:

10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison's Quality Requirement 5.0, states that activities affecting quality shall be prescribed by documented instructions and procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions and procedures.

BAP 100-7, Revision 4, "Overtime Guidelines for Personnel That Perform Safety Related Functions," paragraph C5.b, states that the following overtime guidelines shall be followed: b. An individual should not be permitted to work . . . more than 72 hours in any 7 day period. Paragraph C6. and C8. further state that deviations shall be approved by the Station Manager or his designee in accordance with BAP 100-7T1, "Overtime Deviation Authorization," and after the fact, approvals should be obtained by the following normal work day or as soon as practical and insure BAP 100-7T1 is completed through Step 6 (Department Head Approval).

- a. Contrary to the above, a Fuel Handling Foreman performing duties as a Senior Reactor Operator Limited (SROL) exceeded the 72 hour guidelines by 10 hours the week of September 20-26, 1990, without authorization documented on BAP 100-7T1 "Overtime Deviation Authorization."

BAP 330-5, Revision 4, "Lock and Key Control," paragraph C.4 states that a Key Control Log shall be maintained in the Shift Engineer's office. An entry will be made in the log whenever a key from the key control cabinet in the Shift Engineer's office is checked out. Upon return of the key, the date and time returned will be completed.

- b. Contrary to the above, on February 6, 1991, key #451 for the Unit 2 Train A Safeguards Test Cabinet panel was found in the door without an entry in the key control log authorizing the key for checkout. Also, key #489/160 was found in the key control cabinet, without an entry in the key control log for the return of the key.

BAP 1100-3, Revision 8, "Fire Protection Systems, Fire Rated Assemblies, Radiation, Ventilation, and Flood Seal Impairments," Paragraph F.1.c, required that a Fire Protection Impairment Permit (FPIP) to be initiated by the Supervisor in charge of the work.

- c. Contrary to the above, on January 21, 1991, a FPIP was not initiated for repairs to the 2B Emergency Diesel Generator door. As a result, when the door was removed for the repairs the licensee failed to either post a continuous fire watch or verify operability of fire detectors on at least one side of the door within one hour.

Notice of Violation

2

This is a Severity Level IV violation (Supplement 1). (50-454/91007-01(DRP); 50-455/91007-01(DRP))

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

3-29-91  
Dated

W.D. Shafer  
Wayne D. Shafer, Chief  
Reactor Projects Branch 1