

Commonwealth Edison Company
Byron Generating Station
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February 6, 1995

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Byron Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report No. 50-454/94025; 50-455/94025
NRC Docket Numbers 50-454, 50-455

Reference: Edward G. Greenman letter to Mr. Graesser dated
January 6, 1994, transmitting NRC Inspection
Report 50-454/94025; 50-455/94025

Enclosed is Commonwealth Edison Company's response to the Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited a Severity Level IV violation requiring a written response. ComEd's response is provided in the attachment.

If your staff has any questions or comments concerning this letter, please refer them to Don Brindle, Regulatory Assurance Supervisor, at (815)234-5441 ext.2280.

Respectfully

A handwritten signature in dark ink, appearing to read "K. L. Graesser". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

K. L. Graesser
Site Vice President
Byron Nuclear Power Station

Attachment(s)

cc: J. B. Martin, NRC Regional Administrator - RIII
G. F. Dick, Byron Project Manager - NRR
H. Peterson, Senior Resident Inspector, Byron
L. F. Miller Jr., Reactor Projects Chief - RIII
D. L. Farrar, Nuclear Regulatory Services Manager, Downers Grove
Safety Review Dept, c/o Document Control Desk, 3rd Floor, Downers Grove

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VIOLATION (454(455)/94025-01)

During an NRC inspection conducted from October 21, 1994 to December 15, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1994) the violation is listed below:

Technical Specification 6.8.1.a, "Procedures and Programs," requires written procedures to be established, implemented, and maintained.

Technical Specification 6.2.2.e, "Unit Staff," requires administrative procedures to be developed and implemented to limit the working hours of unit staff who perform safety-related functions.

Byron Administrative Procedures, BAP 100-7, "Overtime Guidelines for Personnel," require that "initial approval of guideline deviations shall be made before the fact."

Contrary to the above, during the period of July 1, 1994, through November 1, 1994, the initial approval of guideline deviations prior to the occurrence was not obtained on at least 29 separate occasions.

This is a Severity Level IV violation (Supplement I).

REASON FOR THE VIOLATION

Byron Administrative Procedure, BAP 100-7, "Overtime Guidelines for Personnel," was developed to ensure that guidance is available for times when overtime is required. This guideline is used to document that the potential for significant reduction in personnel effectiveness has been evaluated. Every effort is made to predetermine overtime requirements and thus obtain authorization prior to a deviation. There are cases where overtime has not been pre-approved, but is required to complete a task rather than turnover to the next shift or complete it the next day. In these cases every effort is made to obtain the required approvals prior to working the overtime, this may include verbal approval.

A review was completed by the NRC between October 21, 1994 and December 15, 1994 that identified several concerns relating to the adequacy of implementing the overtime deviation authorization program. The main concerns were that the initial approval date was after the deviation date or no initial approval date was provided.

In mid October, prior to the NRC's review, Site Quality Verification (SQV) performed a surveillance on overtime deviation documentation. The surveillance focused on completion of the form when required and the date of initial approval compared to the date of deviation. The surveillance found three cases where overtime deviations existed without the respective authorization, and sixteen cases where the initial approval was after the deviation date. The corrective actions for this SQV finding were still being implemented when the NRC performed their review.

The cause of this event is that plant personnel did not fully appreciate the requirements for documentation and authorization of overtime deviations. This allowed for the less than adequate completion and review of the overtime deviations.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

On November 14, 1994, A memo from the Station Manager, and Human Resources Supervisor, was sent to all Department Heads in response to the SQV finding. This memo re-emphasized managements expectations with regards to overtime deviations. The memo also reiterated the fact that authorization must be received in advance of the overtime worked. The memo re-stated the fact that the work force must remain alert and attentive at all times when performing assigned duties and that use of the overtime deviation form assisted in assessing that capability.

Further discussion between the SQV Director and Station Manager identified the need for additional actions. On December 19, 1994, a letter was sent to the SQV Audit Supervisor outlining the following two corrective actions.

- 1) The Station Manager discussed this issue with all the superintendents at the station clearly outlining his expectations of the management personnel in this regard.
- 2) During the February 1995 outage planning meetings, the Station Manager will remind all personnel that the intent of the procedure is to ensure that Byron personnel are alert and attentive at all times when performing assigned duties. NTS Item 454-100-94-02501-01 will track this.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

As previously stated, the Station Manager will remind personnel of the intent of the overtime deviation procedure during the February 1995 outage meetings.

The Station Manager will review all overtime deviations to ensure compliance with the procedure.

In addition, SQV will follow these corrective actions and overview this area during the upcoming refueling outage for effectiveness. NTS Item 454-100-94-02501-02 will track this.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.