

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-454/83-52(DE); 50-455/83-37(DE)

Docket Nos. 50-454; 50-455

Licenses No. CPPR-130; CPPR-131

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Facility Name: Byron Station, Units 1 and 2

Inspection At: Byron Site, Byron, IL
Sargent & Lundy Office, Chicago, IL

Inspection Conducted: November 10, 1983 and December 8, 1983

Inspector: R. Mendez

C. Williams

Approved By: C. C. Williams, Chief
Plant Systems Section

2-2-84

Date

Date

2-2-84

Date

Inspection Summary

Inspection on 11/10 & 12/08/83 (Reports No. 50-454/83-52(DE); 50-455/83-37(DE))

Areas Inspected: Followup inspection regarding previous inspection findings.
This inspection involved a total of 10 inspector-hours by two Region III personnel.

Results: Of the areas inspected, no apparent items of noncompliance were identified.

DETAILS

1. Persons Contacted

Commonwealth Edison Company (CECo)

**J. J. Dennehey, Lead Electrical
R. B. Klingler, Quality Control Supervisor, PCD
*J. O. Binder, Project Electrical Supervisor

Sargent and Lundy (S&L)

**T. B. Thorsell, Senior Electrical Project Engineer
**C. M. Chiappetta, Assistant Manager, Electrical Department
**J. D. Regan, Electrical Engineer

*Denotes person present at the exit meeting on November 10, 1983.

**Denotes those persons present at the exit meeting on December 8, 1982.

2. Action on Previously Identified Items

This inspection and the subsequent meeting at the Sargent and Lundy office was performed with the purpose of obtaining the status of the items of noncompliance identified in Inspection Report 50-454/82-19; 50-455/82-14, including the actions described in the CECo letter of December 13, 1982. The items that follow summarize the Region's understanding and status of the issues discussed.

(Closed) Noncompliance (454/82-19-03); (455/82-14-03):

- a. It was previously identified that Class 1E and non-Class 1E cable trays were not separated by a minimum of one inch as required by the licensee's commitments to IEEE 384-1974. The licensee contended that the apparent separation problems identified by the inspector had already been detected by Sargent and Lundy (S&L) and that resultant corrective action would be either to analyze or reroute the cable trays. This conclusion was included in the licensee's December 13, 1982 response letter and apparently disagrees with the item of noncompliance. It appears the method the licensee was using to identify separation conflicts was to review raceway drawings and recommend tray covers where separation was less than that specified by the FSAR. The inspector pointed out that inherent in the installation of electrical raceway was the routing tolerances allowed by specifications. Therefore, based on the drawings alone, the one inch criteria would be indeterminate because installation tolerance can vary up to two inches. The licensee acknowledged their original response (dated 12-13-82) was in error and that the drawing review process was not comprehensive enough to identify the conflicts of the one inch tolerance. The licensee currently conducts physical plant walkdowns to identify

instances of cable tray separation. In addition, the inspector could not verify from information available at the site whether the electrical separation problem areas had been identified previously. Licensee and S&L representatives acknowledged that records available at the site were deficient in this one area and therefore the item of noncompliance would stand as issued. Drawings which are currently issued to the site now contain the additional information. The action taken to correct this problem appears adequate.

In summary, it was established during the meeting between the Region and licensee representatives at S&L, that this item of noncompliance would stand as written by NRC based on lack of information available at the Byron site. The licensee representatives acknowledged the Region's position. No further action by the licensee is required unless the licensee differs from the position and understanding established with the Region during the meeting of December 8, 1983.

- b. It was previously identified that separation between a Class 1E tray and an HVAC duct did not meet the requirements of Regulatory Guide 1.29 and the separation criteria for circuits in IEEE 384-1974. The inspector could not determine from available records at the time of the inspection, whether the licensee had previously identified this apparent problem or if the HVAC duct was seismically supported. During the meeting at the S&L offices, the licensee provided additional information regarding seismic support of HVAC ducts. In addition, the licensee stated that prior to fuel load all HVAC ducts would be walked down to determine conformance to Regulatory Guide 1.29. Based on the information provided during the meeting this item is withdrawn as an item of noncompliance and will be tracked as an unresolved item (483/83-52-01).

(Open) Noncompliance (454/82-19-02; 455/82-14-02):

This item involved instances where three Class 1E cables had not been routed in accordance with their respective cable pull cards. The inspector had observed that the three foot routing tolerance rule had been apparently violated. With respect to cable 2SX345, during Byron inspection 82-19, the inspector observed that routing point 22104C was missing from the routing card for the cable. However, in the licensee's 30 day response it was stated that FCR No. F7515, dated October 26, 1981 was prepared to add routing point 22104C. Although, the information was not made available during the inspection, this is not an example of an item of noncompliance. With respect to cable 1VA156, the routing was determined to be in apparent violation. Reconstruction of the routing points for cable 1VA156 indicate that based on the interpretation of the tolerances in S&L specification 6E-0-3000A, the missing routing point 1694A should have been included on the cable pull card. The licensee acknowledged that if the circumstances described during the meeting of December 8, 1983 were correct, the routing of cable 1VA156 was an apparent violation.

The routing of the third cable 1VE034 could not be reconstructed but it appears the routing tolerance may have also been violated. This item remains open pending physical verification of the routing points.

(Closed) Noncompliance (454/82-19-03; 455/82-14-03):

This item involved cables that apparently violated Hatfield's Procedure #10, which required that Class 1E and non-Class 1E cables in air be separated by twelve inches. Class 1E and associated cables identified in inspection report 82-19; 82-14 were observed to be either touching or routed about four inches above non-Class 1E cables in cable tray section 12121D C1B. Four of the six cables identified as Class 1E were subsequently determined to be associated cables. The licensee took corrective action to label the cables correctly. In addition, the licensee modified Hatfield Procedure #10 to address cables in raceway and cables of a different safety classification routed in close proximity. This item is closed.

3. Exit Interview

The inspector met with licensee representatives at the conclusion of the inspection on November 10, 1983 and December 8, 1983. The licensee acknowledged the information.