# U. S. NUCLEAR REGULATORY COMMISSION

### REGION III

Report Nos: 50-454/83-41(DPRP); 50-455/83-31(DPRP)

Docket Nos.: 50-454 and 50-455

License Nos.: CPPR-130: CPPR-131

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

Facility Name: Byron Station, Units 1 and 2

Inspection At: Byron Station, Byron, IL

Inspection Conducted: July 1 through August 31, 1983

Du Hayes For

Inspector: K. A. Connaughton

Approved By: D. W. Hayes, Chief

Reactor Projects Section 1B

 $\frac{9/23/83}{\text{Date}}$ 

Inspection Summary

Inspection on July 1 through August 31, 1983 (Report Nos. 454/83-41[DPRP]; 455/83-31[DPRP])

Areas Inspected: Routine, unannounced safety inspection to review preoperational testing operations and procedures; IE Circular file responses; licensee actions on previously identified items; allegations; and other activities. The inspection consisted of 52 inspector-hours onsite by one NRC inspector including 0 inspector-hours during off-shifts. Results: No items of noncompliance were identified.

# DETAILS

# 1. Persons Contacted

### Commonwealth Edison Company

- V. Schlosser, Byron Project Manager
- \*R. Querio, Byron Station Superintendent
- R. Tuetken, Project Construction Assistant Superintendent
- C. Tomashek, Startup Coordinator
- \*M. Stanish, Site Quality Assurance Superintendent
- R. Klinger, Project Construction Quality Control Supervisor
- \*R. Pleniewicz, Assistant Superintendent, Operating
- \*D. St. Clair, Technical Staff Supervisor
- F. Hornbeak, Assistant Technical Staff Supervisor for Preoperational Testing
- T. Schuster, Licensing Staff
- R. Glazier, Licensing Staff
- C. Lenth, Licensing Staff
- L. Wehner, Technical Staff
- J. Stanton, Technical Staff
- B. Milner, Technical Staff
- B. Dean, Assistant Technical Staff Supervisor
- H. Kazmarek, QA
- R. Ward, Assistant Superintendent Administrative and Support Services

\*Denotes persons attending exit interview on September 6, 1983.

# 2. Preoperational Test Witnessing

The inspector witnessed portions of preoperational test 2.073.12, "Safety Injection", Section 9.6, to determine whether or not: operating and maintenance personnel were briefed on the scope and objectives of testing to be performed; prerequisites and initial conditions, as applicable, were met; precautions were observed; test procedures were adhered to; test procedures were current and in use at each test station; communication between test stations were adequate; and deficiencies were documented, evaluated and corrected, as necessary to assure valid test results and in accordance with applicable program requirements.

No items of noncompliance were identified.

# 3. Preoperational Test Procedure Review

The inspector reviewed test procedure 2.133.10, "Reactor Loose Parts Monitor" against the FSAR, SER, and Regulatory Guide 1.68. Questions and comments from this review were found to have been addressed by test changes processed prior to or during test execution.

No items of noncompliance were identified.

### 4. Licensee Actions on Previously Identified Items

a. (CLOSED) - Open Item 454/82-15-02, "Potential for Stratification of Diesel Fuel Oil Mixture".

The Applicant took a fuel oil sample from a 125,000 gallon outside storage tank OD003T and had it analyzed by Phoenix Chemical Laboratory Inc. to determine whether or not the fuel oil, which was a mix ture of 75% #2 and 25% #1 fuel oils, was thoroughly blended. The results of the analysis supported the Applicant's and the fuel oil supplier's contention that mixing and agitation during fuel oil delivery assured that the two grades of oil were thoroughly mixed and therefore not subject to separation after an extended period of time in storage.

This item is considered closed.

b. (CLOSED) - Unresolved Item 454/82-16-02; 455/82-11-02, Temperature and Humidity Limits for Storage of Radiographs".

The Applicant has sought and received guidance from the radiographic film supplier concerning temperature and humidty limits for storage. The guidance did not define "peak" or "transient" limits. Since the time this item was identified, however, the Applicant has installed a dedicated air handling unit which automatically maintains temperature and humidity within the recommended steady state limits.

This item is considered closed.

5. Inspection and Enforcement Circulars (IEC's)

(CLOSED) - IEC 79-21, "Prevention of Unplanned Releases of Radioactivity".

A review of the Applicant's file response indicated that procedures for the transfer of radioactive liquids would be reviewed to verify that the recommendations of the subject circular and the Applicant's generic response are incorporated into Byron Station procedures. Action Item Record No. 6-82-166 was written to track this commitment.

This item is considered closed.

(CLOSED) - IEC 81-11, "Inadequate Decay Heat Removal During Reactor Shutdown".

This circular was originally to be issued to boiling water reactor (BWR) licensees to supplement Inspection and Enforcement Bulletin 80-12, "Decay Heat Removal System Reliability". The subject circular discussed additional considerations and recommended additional administrative controls to BWR licensees. This circular does not apply to Byron Station.

This item is considered closed.

### (OPEN) - IEC /8-18, "UL Fire Test".

A review of the Applicant's file response indicated that no attempt has been made to enhance fire retardance of cable trays by wrapping them with ceramic fibers. Vertical cable tray floor penetrations are curbed to prevent the ingress of flammable liquids. The applicant has therefore addressed one of three areas of the fire protection program for which the circular recommends consideration. The response did not discuss the use of fast response sprinkler heads or the considerations employed for sprinkler head placement, including the path of air movement in the area to be protected.

This item remains open.

### 6. Allegations

#### a. Background

On November 23, 1982, Byron Station workers contacted the NRC resident inspectors at Byron and expressed concern relative to work performed by the Hatfield Electric Company (HECo). Later that day, during an offsite interview by NRC representatives, the workers made certain allegations and provided some specific information relative to welding, hanger installations, and other activities by HECo.

# b. Allegation

Pittsburgh Testing Lab (PTL) inspectors detailed to HECo were told not to discuss problems with PTL supervisors.

### Discussion

Pittsburgh Testing Lab inspectors detailed to HECo report administratively (time and attendance, payroll, employee benefits etc.) to supervision at PTL and report functionally to supervision at HECo. Any quality problem identified by an inspector is to be documented and processed for correction in accordance with HECo procedures. If the concerns are not resolved to the inspector's satisfaction by HECo the inspector can contact the Applicant's QA organization or Project Construction Department QC group. If the inspector still does not get satisfaction, he may contact the NRC. This method of escalating inspector concerns is prescribed in writing and all inspectors are given indoctrination training which includes a presentation of these avenues for having their concerns resolved. This policy does not discourage inspectors from seeking satisfaction where quality or safety concerns are involved. No further action with regard to this allegation is warranted.

# c. Allegation

Corrective action is often untimely. Resolution of discrepancies may take up to four months. This may preclude the Discrepancy Report originator from reviewing the resolution for acceptability.

### Discussion

In the case of a nuclear power plant under construction, the timeliness of corrective action is a concern in several regards. Corrective actions might become harder to implement as the project progresses due to ongoing construction activities which may make one item harder to correct, or result in more items requiring correction. If corrective action takes a great deal of time, the likelihood that documentation of the item or condition requiring corrective action will be lost or destroyed increases. The alleger's concern that the originator may not have the opportunity to verify corrective actions does not have potential safety significance. As long as the description of the item or condition requiring corrective action is adequately documented (as required) and the individual accepting the resolution of the item or condition is properly certified to do so, it is not mandatory that the originator review the resolution for acceptability. No further action with regard to this allegation is warranted.

### d. Allegation

The electrical area at Byron Station is going to be another Zimmer.

### Discussion

This allegation was originally documented as a "comment". It was subsequently decided by the NRC that the comment would be formally addressed as an allegation and discussed in a future NRC inspection report. The allegation does not provide any specifics and is of a highly subjective nature. No further action with regard to this allegation is warranted.

### 7. Assignment of New NRC Senior Resident Inspector

On August 7, 1983, Mr. Julian M. Hinds, Jr., was designated the NRC Senior Resident Inspector for Byron Station. Mr. Hinds was formerly the Project Inspector for Reactor Projects Section 1B, Division of Project and Resident Programs, in the NRC Region III Office. Mr. Hinds reported for permanent duty at the Byron Site on September 6, 1983.

### 8. Exit Meeting

On September 6, 1983, the inspector met with Mr. V. I. Schlosser and others to discuss the scope and findings of the inspection. Attendees at this meeting are denoted in Paragraph 1.