

## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

JUL 2 1984

Docket No.: STN 50-454

MEMORANDUM FOR: J. Nelson Grace, Director

Division of Quality Assurance, Safeguards,

and Inspection Programs

Office of Inspection and Enforcement

FROM:

D. G. Eisenhut, Director Division of Licensing

Office of Nuclear Reactor Regulation

SUBJECT:

BYRON INTEGRATED DESIGN INSPECTION

Your May 15, 1984 memorandum requested NRR review of Commonwealth Edison's response to two items identified in the Byron Integrated Design Inspection (IDI).

The first item (unresolved Item 5-1) concerns lack of separation between cables-in-air and cables in raceways. However, the IDI report did not identify the division of the cables in question. Physical separation and electrical isolation should be provided to maintain the physical and electrical independence of components between two redundant Class IE divisions and also between Class IE and non-Class IE components. This is discussed in the Byron Safety Evaluation Report (NUREG-0876) in Section 8.4.4. However, separation of circuits and equipment within the same Class IE division is not specifically required by any regulatory criteria.

Thus, in order to evaluate concerns in this item any further, we need more information. If the applicant is installing cable in a manner not in accordance with the criteria in its FSAR and approved by the staff, a FSAR revision should be submitted for staff review.

The second item (unresolved Item 6-1) involves the necessity of verifying the initiation of more than one train of redundant equipment during the loss of off-site power test. We agree with the applicant's response. The loss of off-site power test involves verification of diesel generator starting and load sequencing. If one train of the equipment is running, the loss of off-site power test is successful. Although a failure of a redundant train to initiate constitutes a problem that should be investigated and corrected, it should not be considered a failure in the loss of off-site power test.

Please let me know if you need additional assistance in reviewing the applicant's IDI responses. Also, please inform me if the cable installation discussed in unresolved Item 5-1 does, in fact, constitute a violation of our separation criteria.

D. G. Eisenhut, Director Division of Licensing

Office of Nuclear Reactor Regulation

Contact: L. Olshan, DL

492-7070

Please let me know if you need additional assistance in reviewing the applicant's IDI responses. Also, please inform me if the cable installation discussed in unresolved Item 5-1 does, in fact, constitute a violation of our separation criteria.

Driginal signed by

D. G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation

Contact: L. Olshan, DL 492-7070

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