



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 80515

March 27, 1992

U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Byron Nuclear Power Station Units 1 and 2
Response to Notice of Violation Associated with
Inspection Report 50-454/92004; 50-455/92004
NRC Docket Numbers 50-454 and 50-455

References: L. R. Greger letter to Cordell Reed dated
February 28, 1992 transmitting NRC Inspection
Report 50-454/92004; 50-455/92004

Enclosed is Commonwealth Edison Company's (CECo) response to the
Notice of Violation (NOV) transmitted by the referenced report.
The violation dealt with untimely revisions of Emergency Plan
Implementing Procedures following revision to the Byron Annex to
the Generating Station Emergency Plan.

If there are any questions or comments regarding this response, please
contact Perry Barnes, Compliance Supervisor, at 708/515-7278.

Sincerely,

Perry W. Barnes for

T. J. Kovach
Nuclear Licensing Manager

Attachment

cc: A. Bert Davis, Regional Administrator - Region III
A. H. Hsia, Project Manager, NRR
W. J. Kropp, Senior Resident Inspector

620065

9204020162 920327
PDR ADOCK 05000454
Q PDR

ZNLD/1648/1

TEO/11

ATTACHMENT

Response to Notice of Violation Inspection Report 454/92004; 455/92004

VIOLATION (454/9200401; 455/9200401)

10 CFR Part 50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 10 CFR Part 50.47(b) and the requirements to Appendix E to 10 CFR Part 50. The Generating Station Emergency Plan (GSEP), Section 8.5.7, states that Emergency Plan Implementing Procedures (EPIP) and corresponding lesson plans shall be developed consistent with the GSEP within 4 months of any GSEP revision.

Contrary to the above, Byron EPIP, BZP 200-A1 Revision 2, "Byron Emergency Action Levels", had not been updated as of February 14, 1992, to be consistent with Revision 4 of the Byron Annex to the GSEP which had an effective date of July 15, 1991, exceeding the 4-month period.

REASON FOR THE VIOLATION

Several inconsistencies were noted between Emergency Action Levels (EALs) in the Byron Annex and those in EPIP BZP 200-A1, "Byron Emergency Action Levels". These inconsistencies resulted from a lack of administrative control over revisions to the Byron Annex.

Six EALs under Condition 6, "Natural and Destructive Phenomena", relating to the river level, were inadvertently transposed to a superceded version. The superceded version was introduced when the word processing document file was copied for the annex update. The word processing file used represented the last revision when all pages of the EAL Section (5.1) were revised (Revision 3b). Management reviews failed to identify that pages which were revised by Revisions 3c and 3d were not the same document files. This resulted in an error being introduced into the Byron Annex EALs (Rev 4). This error was not carried into the station EAL implementing procedure (EPIP BZP 200-A1).

Two EALs under Condition 8, "Security Threat", were upgraded in the Byron Annex; however, they were not upgraded in the EPIP BZP 200-A1. The EAL associated with protected area intrusion was upgraded from an Unusual Event to an Alert, and the EAL associated with vital area intrusion was upgraded from an Alert to a Site Emergency. Also, an additional EAL was added to Condition 8 EALs that a bomb device discovered in a vital area should be declared as an Alert.

These changes were included during the draft of Revision 4 to the Byron Annex in response to an annual annex review, which identified the need to upgrade the Byron Security EALs to address issues brought up during a Quad Cities Exercise (these changes had previously been made to Quad Cities and Dresden EALs). Subsequent to the draft, these changes were not highlighted during the revision process and were not included in the change summary for Revision 4.

The Byron Station Security Plan, procedures, and contingency actions operate independently of EPIP BZP 200-A1 and of the Byron Annex. Regardless of how the station classified the event, Station Security would have responded according to their own plan and procedures to a posed threat. At no time was the public safety, nor the security of the Station, compromised by these inconsistencies.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The inconsistencies were identified, by Byron Station and Nuclear Services Emergency Preparedness (NSEP) personnel, on January 23, 1992 during a review of EALs. This review was being conducted to incorporate improvements to Emergency Action Levels (EALs) and Philosophy statements. The correct EALs were identified and appropriate revisions to station procedures and the GSEP Annex were initiated. The affected Byron Station procedures were approved for use on February 6, 1992.

Revision 4a to the Byron Annex was onsite reviewed on February 22, 1992, to correct the Condition 6 EAL inconsistencies. The offsite review was completed on March 6, 1992. The Byron Station GSEP Annex Philosophy document was also updated to reflect the EAL changes.

All revisions to EALs in progress were stopped on January 27, 1992 to determine the extent of the problem and ensure errors were not introduced into the newly written EALs. Efforts were redirected to perform a line-by-line comparison of the EALs in all six Station Annexes and relevant Station EIPs. The comparison was completed on February 25, 1992 and revealed that there were no technical inconsistencies at the other five stations.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

The GSEP establishes the policy by which revisions to the station specific annexes are controlled. This policy is general in nature and a need was identified by NSEP personnel to provide more detailed information in the form of a procedure. Such a procedure was in conceptual development at the time of the Byron Station inspection. NSEP has accelerated development of administrative procedure, CEPIP-1000-4, to provide guidance for the control of GSEP Annex revisions. The procedure is to include the following:

- A change log system for development and approval of draft changes, tracked by a designated NSEP individual.
- The unique numbering sequence for tracking of draft changes.
- The process for reviewing and identifying changes made to draft changes will include management verification that the correct document files are used.
- A detailed change summary required with each revision and revision bars indicating the items that have been changed from the previous revision.

The Corporate Emergency Plan Implementing Procedure, CEPIP-1000-4, will be completed by April 30, 1992.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved on April 30, 1992.