



Commonwealth Edison

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Address Reply to: Post Office Box 767
Chicago, Illinois 60690

June 7, 1984

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Byron Generating Station Units 1 and 2
Inspection Report Nos. 50-454/84-17
and 50-455/84-12

Reference (a): April 19, 1984 letter from W. S. Little
to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection at Byron Station by Messrs. R. Mendez and A. S. Gautam on March 19-23, 1984. During this inspection certain activities were found to be not in compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation appended to reference (a).

The response to this noncompliance was delayed to permit field inspection by engineering personnel so that the corrective action could be reported here. As noted in Attachment A, an understanding of the cause for this discrepancy requires information from the manufacturer which is not yet available. We will report on that investigation as soon as possible.

Please address any questions you may have regarding this matter to this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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Attachment

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ATTACHMENT A

Response to Notice of Violation

Violation

10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison, Topical Report CE-1A, QA program Revision 21 dated June 6, 1982 Section 5, requires that activities affecting quality be accomplished in accordance with prescribed instructions, procedures and drawings.

Contrary to the above, the inspector examined the as-built installation of DC distribution panels 1DC05E and 1DC06E and determined that the equipment seismic bolting requirements stipulated on GE drawing 212B76201 Revision 2 had not been adhered to in that several of the 5/8" diameter mounting holes were not used and additional holes had been drilled to install 3/8" diameter bolts on the mounting channel sills.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The existing equipment-to-channel mounting arrangements were installed by the manufacturer, General Electric Company; they were not modified in the field. The manufacturer has not provided an engineering analysis which demonstrates that the mounting arrangement, as shipped, meets applicable seismic requirements.

The equipment-to-channel mounting arrangements for DC distribution panels 1DC05E and 1DC06E will be upgraded, probably by welding. An analysis will be performed by our Architect/Engineer (S&L) to ensure that the modified arrangement meets the applicable seismic requirements.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The similar GE panels at Byron 2 and Braidwood Units 1 and 2 have been inspected to verify that the equipment-to-channel mounting arrangement meets applicable seismic requirements. All of these panels were found to be satisfactory.

Additionally, the manufacturer has been asked to review their records and explain this discrepancy.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Byron 1 DC distribution panels will be modified by July 16, 1984. The results of our discussions with GE will be reported by letter to the NRC no later than August 1, 1984.