



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

February 20, 1992

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Subject: Byron Station's Amended Response to I.E.  
Inspection Report 50-454/91026 and 50-455/91026

- References:
- 1) U.S. Nuclear Regulatory Commission Letter to C. Reed from B. Clayton; "NRC Inspection Report 50-454/91026: 50-455/91026", dated December 12, 1991.
  - 2) Commonwealth Edison Company letter to U.S. Nuclear Regulatory Commission from T.J. Kovach; "Byron Nuclear Power Station Units 1 and 2 Responses to Notice of Violation Inspection Report Nos. 50-454/91026; 50-455/91026", dated January 9, 1992.

By submittal of reference 2, Byron Station responded to your Notice of Violation in reference 1 above. With further consideration, Byron Station determined the response should be amended. The amended response is attached and is considered to supercede the previous response transmitted via reference 2.

If your staff has any questions or comments concerning this letter, please refer them to Mary Vincent, Compliance Engineer at (708) 515-7284.

T.J. Kovach  
Nuclear Licensing Manager

cc: A. Bert Davis, NRC Regional Administrator - RII  
A. Hsia, Project Manager - NRR  
W. Kropp, Senior Resident Inspector

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## ATTACHMENT

### NOTICE OF VIOLATION:

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, failure of valve 1SX173 on April 17, 1989 and September 26, 1990, and a failure of valve 2SX169B on April 18, 1991, during Technical Specification surveillances were not documented on the Technical Specification Surveillance Data Package Cover Sheet as required by procedure BAP 1400-9, "Technical Specification Data Package Cover Sheet Completion and Use", Revision 10, paragraph 4.b.2. Valve 1SX173 is the essential service water inlet valve to various coolers for the Unit 1 diesel driven auxiliary feedwater pump, and valve 2SX169B is the essential service water inlet valve for the 2B emergency diesel generator jacket water heat exchanger.

This is a Severity Level IV violation.

### RESPONSE:

1. The reason for the violation:

There was a lack of understanding by the detail of information to be placed on the Surveillance Data Package Cover Sheet.

There was a lack of documentation by shift personnel regarding the operability determination made on the degraded performance of the 2SX169B valve.

2. The corrective steps that have been taken and the results achieved.

A task force was formed to review the 1SX173 problem. An action plan was developed. Those actions were detailed in a letter to the NRC dated December 6, 1991 in response to Notice of Violation 454(455)/91024. Valve 2SX169B was repaired by replacing the solenoid within 24 hours from the time the problem was discovered.

3. The corrective steps that will be taken to avoid further violations.

The surveillance administrative procedures are being reviewed to determine the clarifications needed to give direction to personnel on the disposition and documentation of degraded or failed support equipment discovered during the performance of Technical Specification surveillances. These procedures are expected to be revised by March 1, 1992. This item is being tracked by NTS 4541009102601-1.

Byron Station is committed to initiate implementation of the Integrated Reporting Program (IRP) in June of 1992. This program is structured so that it can be used to allow shift personnel to document operability determinations which are made on degraded equipment. This program also allows for the subsequent review of these determinations by the Station IRP Committee (The Committee is multidisciplined and will meet during normal working days to review and classify the problems identified using the Integrated Reporting Program). This program will be started at Byron Station in June of 1992 and will be fully functional in December 1992. This item is being tracked by NTS 4541009102601-2.

Overall, interim instructions have been issued to the Station Department Heads with directions to ensure that their personnel understand the intent of documenting actions taken for a degraded or failed component. The contents of this letter will be discussed at future Department "Tail Gate" meetings. This item is being tracked by NTS 4541009102601-3.

4. The date when full compliance will be achieved.

Full compliance has been achieved.