



**Commonwealth Edison**

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July 12, 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  
I&E Inspection Report Nos. 50-454/84-23  
and 50-455/84-16

Reference (a): June 12, 1984 letter from R. L. Spessard  
to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection of activities at Byron Station in April 1984 by Messrs. R. Mendez and A. Gautam. During that 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 which was appended to reference (a). Additional information has been provided to clarify the record.

Please direct questions 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: (50-454/84-23-01)

10 CFR 50, Appendix B, Criterion XVII as implemented by CE-1-A Corporate Nuclear Quality Assurance Manual Section 17, (and by Hatfield Procedures #1 and #12) require that inspection records shall identify the Sargent & Lundy drawings used by the inspectors to inspect for proper equipment installation.

Contrary to the above, Hatfield Electric Company (HECO) equipment installation inspection reports 1 thru 100 had no reference to S&L drawings and revisions used to perform inspections of electrical equipment installation.

RESPONSE:

A review of Hatfield Electric Company inspection reports 1 thru 100 yielded the following:

1. Eleven of the reports were written on non-safety related equipment. These reports are not required.
2. Fourteen of the reports had been superseded. The superseding report would then become the governing report.
3. Thirteen of the reports covered equipment set by others. The HECO report was written to report the inspection of the equipment grounding, not installation.
4. One report, report 72, was never used.
5. One report, report 20, is still open. Inspection information will be recorded on the report at the completion of the report.

The forty reports covered in items 1 thru 5 did not need reference to S&L drawings or revisions at the time of the review.

Of the sixty remaining reports, this review yielded the following:

- a) Attached to twelve of the reports were xerox copies of the setting details used during the inspections.
- b) Seventeen of the reports refer to FCR's and two refer to ECN's. These references are made in place of prints.
- c) Fifteen of the reports made reference to drawings and details but did not include the revision. Using the date on the report, the revision numbers were found for the 15 reports.
- d) Fourteen of the reports did not have references. These reports will be superseded, the equipment installation inspections will be performed and new reports written.

In addition to the above review, CECO PCD also reviewed the remaining 590 equipment installation reports (#101 thru #690) which have been initiated by the contractor.

This review yielded the following:

- a) 257 of the reports had reference to detail drawings with revisions.
- b) 96 of the reports refer to FCR's or ECN's.
- c) 29 of the reports reference E.I. drawings with revisions. These E.I. drawings have the installation details on them.
- d) 29 of the reports have been superceded.
- e) 29 of the reports are for hangers, the equipment was set by others.
- f) 6 of the reports are for non-safety related equipment.
- g) 2 of the reports were for re-checking of bolt torque.
- h) 6 of the reports were for grounding only.
- i) 91 of the report numbers have been issued for reports but the reports are open.
- j) 45 of the reports did not reference a revision. The revisions were determined by using the drawing numbers and the date of the report.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

A review of reports 1 thru 100 plus an additional 590 yielded 60 reports with no reference to revisions. The 60 reports have been researched and the revisions in use during the inspections were determined using the date of the report and the drawing number from the report. The revisions have been added to the reports by the use of an attachment.

The 14 reports that had no reference to drawings or revisions have been superseded by new reports. These new reports will be carried as open reports until the equipment installation inspections are complete.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

Hatfield Electric Company has been directed to hold a training session and direct all inspectors to include a reference to S&L drawings and revisions on all equipment installation inspection reports.

Hatfield Electric Company has been directed to revise Procedure 12 and Equipment Setting Inspection Checklists to include the reference to installation detail drawings and revisions.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The training session for Hatfield Electric Company inspectors will be held before July 18, 1984. The revisions to procedure 12 and Form HP-121 will be complete by August 31, 1984.