

Commonwealth Edison Company
Byron Generating Station
4450 North German Church Road
Byron, IL 61010-9794
Tel 815-234-5441



October 23, 1995

LTR: BYRON 95-0354
FILE: 1.10.0101

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Byron Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report No. 50-454/95007; 50-455/95007
NRC Docket Numbers 50-454, 50-455

Reference: Martin J. Farber letter to Mr. Graesser dated
September 26, 1995, transmitting NRC Inspection
Report 50-454/95007; 50-455/95007

Enclosed is Commonwealth Edison Company's response to the Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited a Severity Level IV violation requiring a written response. ComEd's response is provided in the attachment.

If your staff has any questions or comments concerning this letter, please refer them to Don Brindle, Regulatory Assurance Supervisor, at (815)234-5441 ext.2280.

Respectfully,

K. L. Graesser
Site Vice President
Byron Nuclear Power Station

KLG/RC/rp

Attachment(s)

cc: H. J. Miller, NRC Regional Administrator - RIII
G. F. Dick Jr., Byron Project Manager - NRR
H. Peterson, Senior Resident Inspector, Byron
L. F. Miller Jr., Reactor Projects Chief - RIII
D. L. Farrar, Nuclear Regulatory Services Manager, Downers Grove
Safety Review Dept, c/o Document Control Desk, 3rd Floor, Downers Grove

300063

(p:\95bylrs\950354\102595)

A Unicom Company

9511030301 951023
PDR ADOCK 05000454
Q PDR

JED

ATTACHMENT I

VIOLATION (455/94007-03)

Technical Specification 6.8.1 required that written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A, Regulatory Guide 1.33, Revision 2, February 1978, which includes procedure adherence. Three examples contrary to the above follow:

1. Byron Administrative Procedure (BAP) 499-3, "Requirements for Erecting Scaffolding and Ladders," required the following for pre-qualified seismic scaffolding: (1) maintain a clearance distance to safety related equipment or use clearance ties, (2) tipping ties, (3) longitudinal cross bracing (i.e., "X" bracing) on one longitudinal side and at least one longitudinal brace on the other side or "K" bracing, and (4) width cross bracing (i.e., "X" bracing) on both ends of each bay.

Contrary to the above, during the period June 26 through July 14, 1995, a scaffold, documented as pre-qualified seismic, was constructed on and over safety related equipment in the 2A Diesel Generator (DG) room and did not: (1) maintain adequate clearance distance to safety related equipment or use clearanceties, (2) use adequate tipping ties, (3) contain adequate longitudinal cross bracing (i.e., "X" bracing) on one longitudinal side and at least one longitudinal brace on the other side or "K" bracing, and (4) contain adequate width cross bracing (i.e., "X" bracing) on both ends of each bay.

2. BAP 499-3 required that no scaffolding or ladders would be attached or secured to safety related equipment without prior On-Site and 10 CFR 50.59 review of the installation.

Contrary to the above, during the period June 26 through July 14, 1995, a scaffold was constructed on and over safety related equipment in the 2A DG room without prior On-Site and 10 CFR 50.59 reviews of the installation.

3. BAP 499-3 required that if scaffolding cannot be built as pre-qualified seismic scaffolding according to BAP 499-3, then an engineering review shall be completed prior to constructing scaffold.

Contrary to the above, during the period June 26 through July 14, 1995, a scaffold was constructed in the 2A DG room on and over safety related equipment that did not meet the pre-qualified seismic requirements contained in BAP 499-3 without prior engineering review.

This is a Severity Level IV violation (Supplement I).

REASON FOR THE VIOLATION

Byron Administrative Procedure, BAP 499-3, "Requirements For Erecting Scaffolding and Ladders," was developed to provide guidance for the erection of scaffolding and ladders. Scaffolding that is erected near operable equipment is required to be seismically qualified. BAP 499-3 references a corporate Technical Information Document, TID-MS-01, which discusses scaffold qualification requirements. Based on an inspection of the scaffold by Byron Station Support Engineering personnel and on discussions with the maintenance foreman, it can be concluded that the installation crew attempted to make the scaffold meet seismic requirements. This conclusion is demonstrated by the use of tie-backs and stand-offs at numerous locations around the scaffold. However, as discussed in the NRC inspection report, the tie-backs and stand-offs did not meet all the requirements of the scaffold procedure, BAP 499-3.

ComEd has determined the primary root cause of this event to be that plant personnel were not fully cognizant of all the seismic requirements of BAP 499-3. Additionally, the specific wording in BAP 499-3 allowed for some misinterpretation of the requirements by station personnel during the installation of the scaffold. Clearly, the intent of the plant personnel was to meet the requirements of the BAP. However, the interpretation of the wording in the BAP led to this non-compliance.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Upon notification of the non-compliance by the Byron Operations Department, two Station Support Engineering Personnel performed a walkdown inspection of the 2A DG scaffold. Additionally, a maintenance crew was provided to make alterations to the scaffold, as necessary. Upon completion of the alterations, a Station Support Structural Engineer determined that the scaffold was seismically stable and a 10 CFR50.59 evaluation was completed. This conclusion was based on the engineer's understanding of the requirements in TID-MS-01 and the technical basis for those requirements. Follow-up calculations were later performed which substantiated that the engineering judgment used in making the scaffold alterations was correct.

As an additional corrective action, all accessible areas of the plant were walked down with operating and maintenance personnel to locate any additional scaffold that were erected near operable equipment. Alterations were made to the identified scaffolds, where appropriate.

Finally, tailgate training sessions were held with the appropriate Byron Operations and Maintenance personnel to clarify the requirements and management expectations for the installation of all seismic scaffolding.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

BAP 499-3 has been revised to provide clarification of the requirements for seismic scaffolding. The evaluation checklists in BAP 499-3, 3T1 and 3T2, were also revised to require an engineering review and sign-off for all seismic scaffolds. Byron NTS# 454-100-95-00703-01 documents the completion of this activity.

The Byron Training and Engineering departments are reviewing the formal scaffold training currently provided to station personnel. The training module will be revised, as appropriate, to ensure that adequate instruction is provided to station personnel for the erection of seismic scaffolding. Byron NTS# 454-100-95-00703-02 will track completion of this activity.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 7/14/95 when the scaffolding was determined, by engineering evaluation and 50.59, to be seismically qualified.