



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION III  
801 WARRENVILLE ROAD  
LISLE, ILLINOIS 60532-4351

December 11, 1995

EA 95-197

Mr. Michael J. Wallace  
Vice President and Chief  
Nuclear Officer  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 300  
Downers Grove, Illinois 60515

SUBJECT: NOTICE OF VIOLATION  
(NRC INSPECTION REPORT NOS. 50-454/455/95008(DRP))

Dear Mr. Wallace:

This refers to the inspection conducted on August 4 through September 18, 1995, at the Byron Station. The purpose of this inspection was to review the circumstances surrounding your identification on August 18, 1995, that the 1B Hydrogen Monitor was inoperable. The report documenting the inspection was sent to you by letter dated October 23, 1995.

Based on the information developed during the inspection and the information that you provided in a Licensee Event Report dated September 13, 1995, and in your response to the inspection report dated November 22, 1995, the NRC has determined that violations of NRC requirements occurred. The violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding them are described in detail in the inspection report.

On August 16, 1995, while performing a shiftly surveillance on the 1B hydrogen monitor, a Nuclear Station Operator (NSO) received a trouble alarm which cleared within thirty seconds. The NSO initiated a Problem Identification Form and on August 18, 1995, while conducting troubleshooting, Instrument Maintenance technicians found the 1B hydrogen monitor water trap isolated. The drain line, purge air inlet, and water trap drain line were all separated and capped. One section of tubing (air sample inlet solenoid valve to the water trap) had not been installed. After consulting with the vendor, your staff determined that the 1B hydrogen monitor had been inoperable since initial plant construction.

There were a number of root causes for the event. First, the water trap for the 1B hydrogen monitor was not properly connected during construction and preoperational testing did not identify the error. Second, the surveillance program for the hydrogen monitoring system was inadequate in that procedures had not been established for testing the water purge cycle, and operators did not always run the 1B hydrogen monitor for 17 minutes in accordance with the surveillance procedure requirement. Finally, a lack of questioning attitude was evident by the operators' misconception that the hydrogen monitor trouble

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alarm was an expected feature of the system rather than an indication of a problem.

We recognize that the loss of the hydrogen monitoring system is addressed in your emergency operating procedures, and the hydrogen recombiners and containment air sample panel provide two alternate methods for obtaining containment hydrogen concentration. Notwithstanding, the violations represent a significant failure to comply with the Action Statement for a Technical Specification Limiting Condition for Operation. Therefore, these violations are classified in the aggregate in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600 (60 FR 34381; June 30, 1995) as a Severity Level III problem.

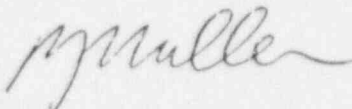
In accordance with the Enforcement Policy, a base civil penalty in the amount of \$50,000 is considered for a Severity Level III violation. Because your facility has not been the subject of escalated enforcement actions within the last 2 years, the NRC considered whether credit was warranted for *Corrective Action* in accordance with the civil penalty assessment process in Section VI.B.2 of the Enforcement Policy. Credit was warranted for your comprehensive corrective actions which included restoring the 1B hydrogen monitor to its proper configuration; verifying the proper configuration of the 1A, 2A, and 2B hydrogen monitors; revising the hydrogen monitoring system surveillance procedures to require operation of the monitor long enough to allow a complete cycle through purge operation, and verification that the purge portion is capable of performing its intended function; reviewing the annunciator response procedure; reviewing other systems which employ process fluid conditioning features during post-accident conditions to verify that these systems are properly tested; and presenting this event and lessons learned during continuing training to Operations, Maintenance, and System Engineering.

Therefore, to encourage comprehensive correction of violations, I have been authorized, after consultation with the Director, Office of Enforcement, not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence is already adequately addressed on the docket in Inspection Report Nos. 50-454/455/95008(DRP), LER 95-002, and your response to the inspection report dated November 22, 1995. Therefore, you are not required to respond to this letter unless the description in the docketed materials referenced above does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room (PDR).

Sincerely,



Hubert J. Miller  
Regional Administrator

Docket No. 50-454

Docket No. 50-455

Enclosure: Notice of Violation

cc w/encl: K. Graesser  
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