

NOTICE OF VIOLATION

Commonwealth Edison Company
Byron Station

Docket Nos. 50-454; 50-455
License Nos. NPF-37; NPF-66
EA 95-197

During an NRC inspection conducted on August 4 through September 18, 1995, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600 (60 FR 34381; June 30, 1995), the violations are listed below:

- A. Technical Specification 3.6.4.1 requires that two independent containment hydrogen monitors shall be operable in Modes 1 and 2.

Technical Specification 3.6.4.1.a requires that with one hydrogen monitor inoperable, the licensee must restore the inoperable monitor to operable status within 30 days or be in Hot Standby within the next 6 hours.

Technical Specification 3.6.4.1.b requires that with both hydrogen monitors inoperable, the licensee must restore at least one monitor to operable status within 72 hours or be in at least Hot Standby within the next 6 hours.

Contrary to the above:

1. On three occasions (from January 25, 1988, until February 10, 1988; November 24, 1988, until December 19, 1988; and June 26, 1989, until July 18, 1989), while in Mode 1, both Unit 1 hydrogen monitors (trains A and B) were inoperable and action was not taken to restore at least one monitor to operable status within 72 hours or to be in at least Hot Standby within the next 6 hours.
2. From February 14, 1985, until August 21, 1995, while in Modes 1 or 2, the Unit 1 train A hydrogen monitor was inoperable and action was not taken to restore the Unit 1 train A inoperable monitor to operable status within 30 days or be in Hot Standby within the next 6 hours. (01013)

- B. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

1. Byron Administrative Procedure BAP 300-1, "Conduct of Operations," Step C.2.b.13, requires that all operating department personnel are responsible to believe and respond to instrument indications until the indications are proven to be incorrect.

Contrary to the above, on numerous occasions between February 3, 1993, and August 16, 1995, operating department personnel did not

respond to the hydrogen monitor trouble alarm when received during shiftly surveillances. (01023)

2. Byron Operating Surveillance IBOS 0.1-1,2,3, "Unit One Mode 1, 2, & 3 Shiftly and Daily Operating Surveillance," Step 11.b, states, in part, "Place the on-off selector switch on the hydrogen monitor panels to the ON position...Allow 17 minutes on Train B before taking readings."

Contrary to the above, from February 3, 1993, until August 16, 1995, operating personnel did not always allow 17 minutes on the Unit 1 Train B hydrogen monitor before taking readings. (01033)

- C. 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," requires, in part, a test program be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above, as of August 16, 1995, the Licensee had not established procedures for testing the water purge cycle of the Unit 1 and 2 hydrogen monitors. (01043)

This is a Severity Level III problem (Supplement I).

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. However, you are required to respond to the provisions of 10 CFR 2.201 if 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 respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

Dated at Lisle, Illinois
this 11 day of December 1995