



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 8, 1992

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Document Control Desk

Subject: Byron Station Units 1 and 2
Response to Notice of Violation
Inspection Report 50-454/92007; 50-455/92007
NRC Docket Nos. 50-454 and 50-455

Reference: M. Ring letter to Cordell Reed dated
April 9, 1992, transmitting NRC Inspection
Report 50-454/92007; 50-455/92007

Enclosed is Commonwealth Edison Company's response to the subject
Notice of Violation (NOV) which was transmitted with the reference letter and
Inspection Report. The NOV cited one Severity Level IV violation requiring a
response. The violation is related to placement of fire watches.

Our response to the violation is provided in the attachment. If your staff has
any questions or comments regarding this response, please refer them to Sara
Reece-Koenig, Compliance Engineer, at (708) 515-7250.

Sincerely,

T.J. Kovach

T.J. Kovach for
Nuclear Licensing Manager

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

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ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT 454/92007; 455/92007

Violation (454(455)/92007-02)

During an NRC inspection conducted on March 9-13, 1992 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procurement for NRC Enforcement Actions" 10 CFR Part 2, Appendix C (1991), the violation is listed below:

Technical Specification 6.8.1.1 required that written procedures be established, implemented, and maintained for the fire protection program.

Byron Administrative Procedure 1100-20, "Fire Prevention When Welding, Cutting and Grinding" Revision 6, required that one or more individuals be designated to watch for potential fire or smoldering during each welding, cutting and grinding operation.

Contrary to the above, on March 10, 1992, the inspector observed two cutting/welding operations in the turbine building on elevation 380 feet near column H-31 that utilized only one fire watch. The fire watch was located beyond a reasonable distance to provide adequate coverage for one of the two cutting and welding operations.

Reason for the Violation

Byron Administrative Procedure 1100-20, "Fire Prevention When Welding, Cutting, and Grinding," does allow more than one cutting/welding/grinding operation to use a single fire watch. Step 3.a. of the procedure states, "One or more individuals in each welding, cutting and grinding area shall be designated to watch for potential fire or smoldering." This refers to a given area where the work activities are taking place and not to each operation thus allowing for one fire watch to perform fire watch activities for more than one operation. Placement of the fire watch(es) is determined by the Fire Marshall's office after conferring with the Supervisor in charge of the work. This process ensures proper positioning of the fire watch in order for the watch to be alert in observing more than one operation.

On March 10, 1992, the NRC Inspector observed two cutting/welding operations in the Turbine building that were using only one fire watch and the fire watch was located beyond a reasonable distance to provide adequate coverage for one of the two cutting and welding operations. The Fire Marshall and the Supervisor in charge of the work had discussed both operations and a location had been identified to place one fire watch to cover both jobs. The fire watch person failed to stay in the area where adequate coverage could be provided for both jobs.

Corrective Steps Taken and Results Achieved

The work in progress was immediately stopped. A fire watch was then established at both work locations.

The fire watch who was beyond a reasonable distance was made aware of the importance of his location relative to both work locations and that this must remain in effect for 30 minutes after work has been completed.

Corrective Steps That Will Be Taken To Avoid Further Violation

The Fire Marshall's office has issued a memo to all Department Heads on the requirements for ensuring fire watches are properly positioned to cover assigned jobs. This will also be included in Fire Watch training by July 1, 1992.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 10, 1992, with the proper placement of fire watches for ongoing operations.