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September 10, 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 No. 50-454/84-44

Reference (a): July 30, 1984, letter from R. L. Spessard
 to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection at Byron on June 11-15, 22, and 25-28, 1984 by Mr. W. Kropp. During that inspection certain activities were identified which were 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).

Please address any 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 1

10 CFR 50, Appendix B, Criterion XVI, as implemented by Section 16 of the Quality Assurance Topical Report, CE-1-A, requires that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, Discrepancy Record (DR) 192-83 was closed although the approved disposition had not been properly implemented.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The disposition of Discrepancy Record DR 192-83 required that two actions be completed. First, documentation was to be obtained from the vendor of a three-phase amplifier to certify that it was of identical design and that it was made of the same or equivalent materials as those provided in the qualified unit. Second, surveillance and testing procedures for the battery chargers were to be verified to meet the intent of Regulatory Guide 1.89, Rev. 1, section 7d.

The documentation provided by the vendor to address the first requirement was inadequate. A replacement certification has been requested. Surveillance and testing procedures for the battery charger have been verified to meet the requirements of section 7d of Regulatory Guide 1.89, Rev. 1.

The spare three phase amplifier covered by Discrepancy Record DR 192-83 is in storage in a "hold" area. Discrepancy Record DR 127-84 has been written to assure that the appropriate vendor certification is obtained prior to its use.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

The Byron Quality Control Department is responsible for verifying the completion of actions taken to resolve discrepancy reports. This event will be reviewed with Byron QC Department personnel in a seminar. These individuals will be reminded of the importance of thoroughness in their completion of these reviews.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The QC seminar will be completed and the new vendor certification will be obtained by September 30, 1984.

VIOLATION 2

10 CFR 50, Appendix B, Criterion XIII, as implemented by Section 13 of the Quality Assurance Topical Report, CE-1-A, requires equipment to be stored in accordance with instructions to prevent their damage or deterioration.

Contrary to the above, the following components were not stored in accordance with the supplier's instruction:

- a. Level B storage requirements were applied to a loop power supply, whereas Level A requirements were recommended by the supplier. Additionally, the supplier recommended that the power supply be stored in an energized state with simulated loads if it was to remain in storage longer than 24 months. The power supply was received in 1981 and had not been energized at the time of this inspection.
- b. Level B storage requirements were applied to a three phase amplifier for the Class IE battery chargers, whereas Level A requirements were recommended by the supplier.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

A joint engineering and Quality Assurance review has determined that ANSI N-45.2-2, level B is a sufficient level of storage for the three-phase amplifier and the loop power supply and that no preventative maintenance is required for these parts. The supplier has also provided certification that level B storage is adequate for the three-phase amplifier. As indicated in the Inspection Report, these components are in Level B storage.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCES

Byron procedure BAP 800-7, Rev. 3, "Maintaining Quality Level of Stored items" was revised to provide guidance on determining storage requirements of ASME III, Class 1, 2, and 3, MC and CS, Reliability Related and Safety Related components. This revision requires review of the manufacturer's storage recommendation and provides a method of documenting changes. A spot check of the Quality Receipt inspection documentation for 200 other items in storage will be made to assure that storage recommendations are being generally followed.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

BAP 800-7 was revised and approved on June 28, 1984. Documentation of the required storage conditions for the power supply and amplifier will be completed through resolution of DR 127-84 and DR 128-84 by September 30, 1984. The check of other items in storage will also be completed by September 30, 1984.