

JUN 8 1992

Docket No. 50-454  
Docket No. 50-455

Commonwealth Edison Company  
ATTN: Mr. Cordell Reed  
Senior Vice President  
Licensing Department-Suite 300  
Opus West III  
1400 Opus Place  
Downers Grove, IL 60515

Dear Mr. Reed:

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORTS NO.  
50-454/92007(DRS); NO. 50-455/92007(DRS))

This will acknowledge receipt of your letter dated May 8, 1992, in response to our letter dated April 9, 1992, transmitting a Notice of Violation associated with Inspection Reports No. 50-454/92007(DRS) and No. 50-455/92007(DRS). These reports summarize the results of the assessment and evaluation of your support and implementation of your fire protection program at your Byron Nuclear Generating Station, Units 1 and 2. We have reviewed your corrective actions and have no further questions at this time. These corrective actions will be examined during future inspections.

Sincerely,

(Original signed by Ronald N. Gardner)  
Ronald N. Gardner, Acting Chief  
Engineering Branch

Enclosure: Letter dated  
May 8, 1992

See Attached Distribution

RIII  
*Jfk*  
Holmes/jk  
06/08/92  
*Yes*

RIII  
*MOZ*  
Farber  
06/8/92

RIII  
*J*  
Jablonski  
06/8/92

RIII  
*RNS*  
Gardner  
06/8/92

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PDR ADOCK 05000454  
G PDR

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JUN 8 1992

Distribution

cc w/enclosure:

M. J. Wallace, Vice President,  
PWR Operations  
T. Kovach, Nuclear  
Licensing Manager  
M. Schuster, Nuclear  
Licensing Administrator  
R. Pleniewicz, Station Manager  
D. Brindle, Regulatory Assurance  
Supervisor  
DCD/DCB(RIDS)  
OC/LFDCB  
A. Hsia, Project Manager, NRR  
P. Madden, NRR  
Resident Inspectors-Byron,  
Braidwood, Zion  
Richard Hubbard  
J. W. McCaffrey, Chief,  
Public Utilities Division  
D. Chavez, DAARE/SAFE  
Robert Newmann, Office of Public  
Counsel, State of Illinois Center  
Robert M. Thompson, Administrator  
Wisconsin Division of Emergency  
Government  
State Liaison Officer



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.h 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.