

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

COMMONWEALTH EDISON COMPANY

BYRON NUCLEAR STATION, UNITS 1 AND 2

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

Report No. 50-454/84-22
Report No. 50-455/84-15

Assessment Period

January 1, 1983 through April 30, 1984

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1. Meeting Summary

a. Attendance

NRC

K. A. Connaughton, Byron Resident Inspector
W. L. Forney, Chief, Reactor Projects Section 1A
W. P. Gammill, Chief, Meteorology & Effluent Treatment Branch (NRR)
W. G. Guldmond, Chief, Operational Programs Section
D. W. Hayes, Chief, Reactor Projects Section 1B
J. G. Keppler, Regional Administrator
R. M. Lerch, Project Inspector
R. J. Marabito, Public Affairs Officer
L. G. McGregor, Senior Resident Inspector - Braidwood
J. I. McMillen, Chief, Operator Licensing Section
C. E. Norelius, Director, Division of Reactor Projects
L. N. Olshan, Byron Project Manager (NPR)
C. B. Ramsey, Reactor Inspector
L. A. Reyes, Chief, Test Programs Section
M. A. Ring, Reactor Inspector
R. L. Spessard, Director, Division of Reactor Safety
J. F. Streeter, Director, Byron Project Division
C. C. Williams, Chief, Plant Systems Section

CECo

R. E. Jortberg, Assistant to Vice President
T. J. Maiman, Manager of Projects
R. E. Querio, Superintendent Byron Station
C. Reed, Vice President
V. I. Schlosser, Byron Project Manager
C. W. Schroeder, Project Licensing and Compliance Superintendent
W. J. Shewski, Manager of Quality Assurance
T. R. Tramm, Nuclear Licensing Administrator

Other

C. Bukro, Chicago Tribune
E. McGreevy, Rockford League of Women Voters
B. Johnson, Rockford League of Women Voters

b. Summary of Discussion

On July 19, 1984, the findings and conclusions of the SALP Board documented in Report Nos. 50-454/85-22; 50-455/85-15 were discussed with the applicant in a meeting at the Holiday Inn in Glen Ellyn, Illinois. Although the objective of the meeting was for the NRC and the applicant to discuss the SALP Board report, the meeting was open to members of the public as observers and all persons in attendance were given the opportunity to ask questions of the NRC at the conclusion of the NRC and applicant discussion. There were no questions asked of the NRC other than by members of the applicant's staff.

The NRC's conclusions of the applicant's performance, along with the salient bases for those conclusions, were presented for each functional area. The following items which were addressed in the July 19, 1984, letter from J. G. Keppler to C. Reed transmitting the SALP Board report to the applicant were emphasized during the course of the meeting:

- . The regulatory performance at the Byron Nuclear Station was considered acceptable during this assessment period.
- . The rating improved from a Category 3 to a Category 2 in four functional areas (safety-related components; support systems; electrical power supply and distribution; quality assurance), but declined from a Category 1 to a Category 2 in one area (licensing activities) and remained at a Category 3 in another area (preoperational testing). Additionally, of two areas rated that were not rated during the last SALP, one (fire protection) was rated a Category 3 and the other (reinspection program) Category 1.
- . Overall, the regulatory performance showed an improving trend.
- . In the preoperational testing area, problems which surfaced in the previous SALP period relating to the conduct of preoperational tests were largely corrected following an enforcement conference early in this assessment period. However, toward the end of the period other concerns were identified relating to the adequacy of review of preoperational test results. Continued high priority management attention is warranted to assure attention to detail and rigorous analysis during the remaining test results reviews.
- . The success rate of operators in passing the operator and senior operator license exams was considerably below the national average and was a factor in reducing the rating to a Category 2 in the licensing activities area. The lower success rate appeared to be largely due to management's determination to achieve a fuel load date which was unrealistic in terms of plant readiness. Such action was not in the best interest of the NRC or Commonwealth Edison Company with regard to optimum utilization of resources. The other factor contributing to the reduced rating in the licensing activities area was the occasional lack of supporting details in submittals made to NRR.

- . The applicant expended considerable resources during this assessment period in conducting the QC Inspector Reinspection Program at the Byron Station. Substantial management involvement was evident in this effort. The applicant's conduct of the inspections and evaluation of the findings were considered to be of high quality and were the reasons for assigning a Category 1 to this area.
- . The applicant's performance in the fire protection area was rated separately for the first time in this SALP. The Category 3 rating reflects the NRC view that there was a lack of concerted management attention to the development and implementation of the fire protection program.

The applicant stated at the conclusion of the discussion that it believed the SALP Board report clearly sets forth the bases for the NRC conclusions in each of the functional areas, and that overall the report fairly assesses the applicant's performance. The applicant stated that although it might have given itself higher ratings in some of the areas, it nonetheless understood and generally agreed with the shortcomings identified by the NRC and was taking actions to correct those problems. The applicant made additional comments which were subsequently submitted in the August 21, 1984, written response to the SALP Board report and which are addressed in Paragraph 2 below.

2. Written Comments Received From Applicant

The applicant submitted its written comments to the SALP Board report in an August 21 1984, letter from B. Thomas to J. G. Keppler. A copy of that letter is attached.

Attachment: Letter dated August 21,
1984, from Bide Thomas to
James G. Keppler regarding
Byron Nuclear Station SALP
Report Nos. 50-454/84-22;
50-455/84-15