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DMB

December 13, 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
Inspection Report Nos. 50-454/84-55
and 50-455/84-38

Reference (a): November 15, 1984 letter from J. F.
Streeter to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of inspections at Byron Station by Messrs. Hinds, Connaughton and Brochman between August 1 and October 3, 1984. During those inspections it was found that certain activities were not in compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation appended to reference (a).

Please address further questions regarding this matter to this office.

Very truly yours,

D. L. Farrar
Nuclear Licensing Administrator

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Attachment

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ATTACHMENT A

Response to Notice of Violation

VIOLATION

10 CFR 50, Appendix B, Criterion XI states, in part: "A test program shall 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... Test results shall be documented and evaluated to assure that test requirements have been satisfied."

The Byron FSAR, Appendix A states, in part, that the licensee complies with the requirements of NRC Regulatory Guide 1.79, Revision 1, September 1975.

NRC Regulatory Guide 1.79, Revision 1, "Preoperational Testing of Emergency Core Cooling Systems for Pressurized Water Reactors", Regulatory Position C.2.b, "Valves" requires verification of proper operation of system valves including response times. Regulatory Guide 1.79 further states that this requires visual verification as well as proper control room indication.

Contrary to the above:

- a. For numerous Emergency Core Cooling System (ECCS) and other Engineered Safety Feature (ESF) valves, preoperational testing was not conducted to verify the accuracy of remote valve position indication used in ESF response time measurements to signify that valves completed stroking to the positions required to fulfill their safety function.
- b. Valve stroke time data for certain ECCS and other ESF valves which suggested inaccuracies in remote valve position indication was not adequately evaluated to determine the acceptability of ESF response time measurements.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

Byron Station has provided Project Engineering Department with a complete listing of remote valve stroke times for ESF actuated valves. This list included the EF-26.12 measured logic response times and the difference between the measured stroke times for local versus remote valve timings. Stroke times which were not measured during preoperational testing were measured during surveillance tests.

Based on this data, Project Engineering has determined that the valve stroke times are within the requirements of the FSAR for containment isolation and ECCS operation.

CORRECTIVE ACTION TAKEN TO PREVENT FURTHER NONCOMPLIANCE

The ESF response time surveillances BVS 3.2.2-1 and BVS 3.2.2-2 will be revised to include provisions for summing the remote valve stroke times obtained in the surveillances with the respective valve stroke time difference for local versus remote valve strokes recorded in the ISI Program. In this manner, any degradation of ESF valve stroke time beyond the allowed standards stated in the FSAR will be detected.

In the event that maintenance work is performed on an ESF valve which could affect the values recorded for the local or remote valve stroke time in the baseline data, new baseline data will be recorded for the stroke timing differential between local and remote.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Procedure revisions will be completed by December 31, 1984.