



Commonwealth Edison

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Address Reply to: Post Office Box 767
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October 15, 1984

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Byron Generating Station Unit 1
IE Inspection Report No. 50-454/84-40
NRC Docket No. 50-454

Reference (a): August 31, 1984 letter from R. L. Spessard
to Cordell Reed

(b): October 3, 1984 letter from D. L. Farrar to
J. G. Keppler

Dear Mr. Keppler:

Reference (a) provided the report of an inspection at Byron Station and corporate offices by Mr. H. A. Walker in June and July, 1984. During that inspection, it appeared that certain activities were in violation of NRC requirements. Reference (b) forwarded Commonwealth Edison's response to the Notice of Violation appended to Reference (a).

Attachment A to this letter provides a revised Page 3 to Attachment B of Reference (b) in response to comments from members of your staff.

Please address further questions regarding this matter to this office.

Very truly yours,

David H. Smith
for D. L. Farrar
Director of Nuclear Licensing

Attachments

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2.b.(2).(b): During the review of auditor certification records for Operations QA auditors, the inspector noted that certain personnel had limited nuclear quality assurance experience. Most were recent college graduates with short term quality experience at the Byron Station. This is an open item which will be reviewed at a later date (454/84-40-05).

RESPONSE

The array of related experience for ten of the twelve Operations Quality Assurance Auditors averages 12.79 years per person and ranges from 31 years to 2.25 years (1-31 years, 1-25, 1-29, 1-16.5, 1-10.65, 1-8.5, 1-5.5, 1-3.25 and 2 with 2.25 years) involving NDE, power plant operations, Navy nuclear, engineering, construction and Quality Assurance experience. More specifically the Nuclear Quality Assurance experience for the Station Quality Assurance personnel at Byron Station totals approximately 60.9 years or an average of 5.08 years per person which includes Quality Assurance work in Commonwealth Edison and Navy Nuclear, Nuclear Quality Control and Radiation Protection experience. The Byron QA Department also has one person with an SRO license for Byron Station and one person attending license training at this time.

The licensed persons will be extensively involved with start-up activities as will those with past Navy Nuclear experience.

Moreover, special attention has been given to staffing this group with experienced people and graduate engineers needed to cover the various activities. As to graduate engineers, there are two others in this Quality Assurance Group. The two are mechanical and nuclear engineers, respectively, with one being new and the other having been at Byron for fifteen months. These two provide technical needs for this group. The licensee has a very aggressive interview program in selecting college graduates and other technically experienced people for assignments to various Edison Departments, which includes the Quality Assurance area. Once a person is selected by the Manager Quality Assurance for assignment to the QA Department, he or she is put through a structured training program within the Department. This includes a 40 hr. department orientation program, 16 hr. class on audit training, minimum of 24 hours of on-the-job training in the technique of auditing. The progress of the individual in performing audits is then monitored by their Lead Auditor, the Supervisor of Operations QA and the Director of Operations.

During the first year in the department, Quality Assurance people receive structured training which includes ASME Code and Standards, Welding, and Non-Destructive Testing and

usually receives other training such as in maintenance, coatings, plant systems, etc. Only as the person completes qualification requirements can he or she be certified to audit additional areas.

2.b.(2)(d) In reviewing Construction QA Audit No. 6-84-05, which was conducted on Westinghouse pipe support calculations, the CECO auditor determined that two errors were found in each of the two calculations had been checked and used in pipe support design. An observation was issued as a result of the