



Commonwealth Edison
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February 5, 1985

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. 50-454/84-82

Reference (a): December 21, 1984 letter from R. L.
Spessard to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of inspections of fire protection activities at Byron Station by Messrs. Ramsey, Coppola, Thomas, Mendez, and Ulie on November 13-14 and December 10, 1984. During that inspection certain activities were found to be not in compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's request to the Notice of Violation appended to reference (a).

Please direct questions regarding these matters to this office.

Very truly yours,

T. R. Tramm
(for)

D. L. Farrar
Director of Nuclear Licensing

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Attachment

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

VIOLATION

Section 2.c(6) of facility operating license No. NPF-23 requires that the licensee maintain in effect all provisions of the approved fire protection program as described in the fire protection report for the facility through Amendment 4 and the licensee's letters dated August 20, 1984, October 11, 1984, and October 15, 1984, and as approved in the SER through Supplement 5.

Contrary to the above, the licensee failed to provide and maintain the following aspects of the approved fire protection program:

- a. Operator Training - Training of all operations personnel required to implement the post fire safe shutdown method and supplemental procedures had not been accomplished as required by Sections 3.1.b.(7), 3.2.D.(10), 3.3.a and 3.4.b. of the Byron Fire Protection Report.
- b. Communications - Suitable portable radio communications were not provided to support safe shutdown as required by Section 3.5.G. of the fire protection report and Section 9.5.1.4 of the SER Supplement No. 5.
- c. Emergency Lighting - Adequate emergency lighting to support safe shutdown was not provided as required by Section 3.5.G. of the fire protection report and Section 9.5.1.4 of the SER Supplement No. 5.

Response to Items of Violation

- a. Operator Training: The safe shutdown procedures were initially approved in October, 1984 and were scheduled to be "walked through" during the special safety inspection. Based upon the results of this walk through, any problems identified with these procedures would be corrected. It was our intention to then implement the required operator training program and to have all affected operating personnel trained on these procedures prior to 5% power. Training on future procedure revisions was to be conducted with the regularly scheduled retraining program.

- b. Communications: A follow-up investigation was conducted to determine where radio "dead spots" existed from the remote shutdown panel to either the division II 4KV switchgear room or the 1A diesel generator room. The results of this investigation revealed no "dead spots" exist. After discussions with operating personnel involved with the inspection, it is our belief that the inability of the person at the remote shutdown panel to communicate with other operator was in part due to these operators responding to the NRC inspector's concerns and comments coupled with a high level of normal plant radio communication during the inspection.
- c. Emergency Lighting: The installed emergency lighting fixtures were obstructed from fully illuminating the remote shutdown panel. As mentioned during the inspection, portable lanterns were available at the remote shutdown panel and could have been used by an operator to supplement the existing lighting.

Corrective Action Taken and Results Achieved

- a. Operator Training: Special retraining sessions have been held for procedures 1-BOA-PRI-5, 1-BOA-ELEC-3 and 1-BOA-ELEC-5. At this time, retraining of all Equipment Attendants on these procedures has been completed, with the exception of the steps in procedure 1BOA-PRI-5 which require the jumpering of motor control centers. Completion of training of the Equipment Attendants on 1-BOA-PRI-5 is scheduled. Special retraining sessions are currently being held for the remaining on-shift operations personnel but are not yet completed.
- b. Communications: A walkdown of the two identified areas was conducted following the safe shutdown demonstration. The walkdown determined that radio "dead spots" did not exist. We believe that the inability to establish communications was caused by the high level of radio transmissions associated with the normal activities of the plant which were occurring at the time of the demonstration, and distractions which may have occurred in an attempt to respond to inspector questions and concerns during the demonstration. Neither of these factors would be present during an actual remote shutdown.
- c. Emergency Lighting: The emergency lighting unit at the remote shutdown panel has been relocated and tested. The emergency lighting levels at the remote shutdown panel are now uniform over the entire panel.

Corrective Action to Prevent Further Noncompliance

- a. Operator Training: Initial training and regularly scheduled retraining will be sufficient to maintain levels of training on the remote shutdown procedures. During the time periods between regularly scheduled retraining, operating personnel will be alerted to changes in the safe shutdown procedures through the required reading program.
- b. Communications: The current communications system is adequate for supporting safe shutdown from the remote shutdown panel and satisfies the commitments made in the Byron Fire Protection Report and the Byron Safety Evaluation Report on the suitability of the communications system to support safe shutdown.
- c. Emergency Lighting: Relocation of the emergency lighting at the remote shutdown panel and assurance of adequate lighting levels at the remote shutdown panel satisfies the commitments made in the Byron Fire Protection Report.

Date When Full Compliance Will Be Achieved

Operator Training: Retraining of all equipment attendants and on shift operating personnel on all aspects safe shutdown procedures 1-BOA-PRI-5, 1-BOA-ELEC-3 and 1-BOA-ELEC-5 will be completed prior to achieving 5% power.

Communication: The communications system is currently in compliance with commitments made to the NRC regarding adequacy of the system to support safe shutdown.

Emergency Lighting: The emergency lighting system is currently in compliance with commitments made to the NRC regarding adequate illumination of the remote shutdown panel to support safe shutdown.