

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-454/85-01(DRS)

Docket No. 50-454

License No. NPF-23

Licensee: Commonwealth Edison Company
Post Office Box 757
Chicago, IL 60690

Facility Name: Byron Station, Unit 1

Inspection At: Byron Station, Byron, Illinois

Inspection Conducted: January 7-17, 1985

Inspectors: *H. A. Walker*
H. A. Walker

Date 1/29/85

M. M. Moser
M. M. Moser

Date 1/29/85

Approved By: *F. C. Hawkins*
F. C. Hawkins, Chief
Quality Assurance Programs Section

Date 1/29/85

Inspection Summary

Inspection on January 7-17, 1985 (Report No. 50-454/85-01(DRS))

Areas Inspected: Routine unannounced inspection by two regional inspectors of QA for the startup testing program; design changes and modifications; and licensee action on previous inspection items. The inspection involved a total of 128 inspector-hours onsite.

Results: No items of noncompliance were identified.

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DETAILS

1. Persons Contacted

Commonwealth Edison Company (CECo)

- *W. B. Burkamper, Operations QA Supervisor
- *S. N. Campbell, Office Supervisor
- *A. J. Chernick, Quality Control Supervisor
- *R. Dorsey, Lead Observer
 - R. G. Gruber, QA Engineer
 - E. R. Lamken, QA Engineer
 - M. Mudge, Maintenance Staff
- *W. D. Pirnat, Group Leader - Technical Staff
- *R. J. Poche, Licensing - Technical Staff
- *R. E. Querio, Station Superintendent
 - D. A. Sible, QA Engineer
- *R. C. Ward, Assistant Superintendent - Administration & Services
- *F. H. Willich, Quality Assurance Inspector

US NRC

- *J. M. Hinds, Jr., Senior Resident Inspector
- K. Connaughton, Resident Inspector

Other personnel were contacted as a matter of routine during the inspection.

*Indicates those attending the exit meeting on January 17, 1985.

2. Licensee Action on Previous Inspection Findings

- a. (Open) Open Item (454/84-36-01(DRS)): Review of the Byron Station records program indicated that a majority of the construction QA records had not been turned over to the licensee's record department. The inspector reviewed the records program, and during discussions with the licensee noted that turn over of construction QA records will occur after Unit 2 fuel load. Review of the effectiveness of the licensee's transfer procedures remains an open item for a future inspection.
- b. (Open) Unresolved item (454/84-36-02(DRS)): The review of the licensee's drawing control quarterly audit system had identified one instance where the quarterly audit instructions were not followed. A memorandum from the plant superintendent was sent to all station personnel emphasizing the need to understand and comply with administrative procedures. During this followup inspection, the inspector found an instance where the quarterly audit system instructions were misinterpreted. As a result, the licensee has revised the instruction sheet to be used during the next quarterly audit. Pending further review to establish the effectiveness of the quarterly audit system, this remains an unresolved item.

- c. (Closed) Open Item (454/84-40-10(DRS)): Operations QA internal audits did not appear to verify implementation of programmatic preoperational testing activity requirements. The inspector reviewed records for four audits and twelve surveillances conducted by Quality Assurance on startup testing activities. These records indicate that adequate implementation verification is being performed.
- d. (Open) Unresolved Item (454/84-40-14(DRS)): Lack of an adequate trending program at the Byron station. The categories described in procedure BAP 1250-7, Revision 0 ("Deviation Trending Procedure") still appear too broad. Sufficient trending data is not available to ensure that repetitive quality problems will be detected by the existing program. This item will remain open pending further review.
- e. (Closed) Open Item (454/84-41-01(DRS)): Inadequate guidelines for reporting modifications to the NRC and reviewing modifications by the offsite review and investigative function. The inspector reviewed the revised administrative procedure BAP 1650-1 and found it to be acceptable.
- f. (Closed) Open Item (454/84-41-06(DRS)): Administrative Procedure BAP 1600-1 ("Initiating and Processing a Nuclear Work Request"), Revision 3, was deficient. Review of Revision 4 to BAP 1600-1 found that all areas of concern had been adequately addressed.
- g. (Closed) Open Item (454/84-41-07(DRS)): Certain maintenance procedures (BMP) did not have adequate instructions for maintaining internal cleanliness. A review of selected maintenance procedures found they now specifically cover internal cleanliness. Discussions with maintenance staff personnel noted that this area is now included in the maintenance procedure preparation/revision checklist. The inspector is satisfied with the licensee's action.
- h. (Closed) Open Item (454/84-41-08(DRS)): Hold points were not normally specified in the maintenance procedures, but were added on a case-by-case basis by QC/QA inspectors when reviewing the work requests. Administrative Procedure BAP 1099-3, ("Department Guideline for Establishing QC Hold Points") Revision 0, has been issued. It now provides guidelines for consistently and adequately identifying hold points.
- i. (Closed) Unresolved Item (454/84-44-01(DRS)): Procedures for storage of safety-related items did not address some requirements of ANSI N45.2.2-1972. During this inspection, the inspector reviewed procedures BAP 800-1 ("Receipt Inspection"), Revision 6, and BAP 1000-10 ("Control and Storage Inspection"), Revision 0. The ANSI N45.2.2-1972 requirements had been appropriately incorporated.
- j. (Closed) Unresolved Item (454/84-44-02(DRS)): QP 10-54 re-inspection results were to be reviewed to verify that previous receipt inspections were effective. Quality control re-inspected 50 items which were selected at random to verify that requirements were met. One of the items was determined to be improperly stored. Because of this problem, 153 additional items were reviewed to verify proper storage; no problems were noted. The NRC inspector reviewed the records of this re-inspection and no problems were noted.

- k. (Closed) Noncompliance (454/84-44-03(DRS)): Discrepancy record (DR) 192-83 was closed even though the approved disposition had not been properly implemented. Another DR (127-84) was written on this item on June 25, 1984. DR 127-84 was closed on September 27, 1984. The inspector verified that the basis for closing the DR was appropriate. Training sessions were held for both quality control and quality assurance personnel on the proper processing of discrepancy records.
- l. (Closed) Noncompliance (454/84-44-04(DRS)): Failure to properly store and maintain a loop power supply and a three phase amplifier to prevent damage or deterioration. An engineering evaluation by CECO and an evaluation by the supplier determined that the existing storage (level B) was adequate for the three phase amplifier. The loop power supply was determined to be nonsafety-related. There were 203 items selected at random and reviewed by the licensee to verify proper storage. One of the 203 items was found to be improperly stored and a deficiency report was written.
- m. (Closed) Unresolved Item (454/84-44-05(DRS)): Storage instructions for a F/L detector assembly could not be located even though shipping documents indicated it was included with the detector. A deficiency report (329-84) was written and the handling and storage requirements were requested from the supplier. These requirements were received, the detector was found to be properly stored, and the deficiency report was closed.
- n. (Closed) Unresolved Item (454/84-44-06(DRS)): Safety-related spare parts for the diesel generators were procured from Cooper Energy Services: the diesel generator supplier. Cooper Energy Services was not on the CECO approved bidders list (ABL). CECO personnel compared purchase orders with the ABL and noted 128 safety-related items which had been procured from suppliers not on the ABL. Hold tags were placed on these items and deficiency reports were written on them. Evaluation and disposition of the items are required prior to release for use. Procedures presently require quality control to review purchase requisitions to ensure that orders are placed with suppliers listed on the ABL. These requirements are being properly implemented.
- o. (Closed) Unresolved Item (454/84-44-08(DRS)): The CECO QA Topical Report and QA program did not address the purchase of spare parts from the original equipment manufacturer as a "like for like" replacement without an evaluation of the supplier's quality assurance program. The Topical Report and the QA program have been revised to address this method of procurement. This was included in Revision 11, issued on July 24, 1984.
- p. (Closed) Unresolved Item (454/84-44-09(DRS)): The Byron document retention schedule did not identify several documents considered to be quality assurance records. The document retention schedule was revised and reissued for use on November 14, 1984, after a review by each affected department. The schedule now addresses the four documents questioned by the NRC inspector.

- q. (Closed) Unresolved Item (454/84-44-11(DRS)): Quality control inspectors were not being certified in a specific discipline, but they were given a general certification as a Level I, II or III inspector. Byron QC inspectors are now being certified in four different disciplines: electrical, mechanical, instrumentation, and welding. Inspectors qualifications were considered acceptable based on a review of certification records for four inspectors selected by the NRC inspector.
- r. (Closed) Unresolved Item (454/84-44-12(DRS)): Conflict between the position description and the QA Topical Report regarding the background requirements for the General QA Supervisor - Maintenance. Wording of the QA Manual and Topical Report has been changed to be compatible with the wording of the position description. The inspector reviewed the changes and found the documents to be acceptable.

3. Program Areas Inspected

This inspection was conducted to verify that adequate quality assurance coverage was being provided during startup testing activities. The inspection results are documented in the following sections of the report.

a. QA for the Startup Test Program

Quality assurance coverage for the startup test program was reviewed to verify compliance with regulatory requirements and operational QA program commitments. The inspection was performed by reviewing applicable procedures and records, conducting personnel interviews, and observing surveillance and audit activities.

(1) Documents Reviewed

- (a) QP 11-2, Attachment A, Revision of 6/26/84, "Instructions for Monitoring of Preoperational Tests"
- (b) QP 18-1, Revision of 11/21/84, "Quality Program Audits"
- (c) QP 18-51, Revision of 11/21/84, "Audits for Operations Quality Assurance Program Audits"
- (d) QP 18-52, Revision of 11/21/84, "Audit and Surveillance of Maintenance, Spare Parts and In-Service Inspection Activities"
- (e) BAP 100-14, Revision 0, "Observing Pre-op and Startup Testing by Observer Group"
- (f) Selected audit records
- (g) Selected surveillance records

(2) Results of Inspection

The inspector reviewed audit and surveillance schedules and records for operations quality assurance audits and surveillances of startup testing activities. Records were reviewed for two station program audits, four startup testing audits and twelve quality assurance surveillances conducted since the operating license was issued. The inspector participated as an observer in one audit of startup testing (QAA 06-85-01) and one QA surveillance (QAS-06-85-09).

Activities of the startup testing observer group, which was formed to witness and perform surveillance of startup testing activities, were also reviewed. Selected individual qualification files for personnel involved in audit and surveillance activities, and qualification files for selected personnel from the observer group were reviewed. The records indicated that the personnel were qualified and the observer group's activities were thorough and well documented.

No items of noncompliance or deviations were identified.

b. Design Changes and Modifications

(1) Documents Reviewed

Seven modification packages

(2) Results of Inspection

A review of the licensee's design change and modification program had been performed during a previous inspection. The purpose of this inspection was to examine the program's implementation. Review of several modification packages and discussions with preoperational staff personnel revealed that there were numerous modification packages in various stages of completion, but none were complete at this time. This inspection item remains incomplete and will be rescheduled.

4. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) at the Byron Station on January 17, 1985, and summarized the purpose, scope and findings of the inspection.