

Commonwealth Edison Company  
Byron Generating Station  
4450 North German Church Road  
Byron, IL 61010-9794  
Tel 815-234-5441

April 17, 1996

**ComEd**

LTR: BYRON 96-0097  
FILE: 1.10.0101

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Document Control Desk

Subject: Byron Nuclear Power Station Units 1 and 2  
Response to Notice of Violation  
Inspection Report No. 50-454/95013; 50-455/95013  
NRC Docket Numbers 50-454, 50-455

Reference: Lewis F. Miller, Jr. letter to Mr. Graesser dated  
March 20 1996, transmitting NRC Inspection  
Report 50-454/95013; 50-455/95013

Enclosed is Commonwealth Edison Company's response to the Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited one (1) Severity Level IV violation requiring a written response. ComEd's response is provided in the attachment.

This letter contains the following commitments:

- 1) This event and procedural enhancements to BOP AB-6, BOP AB-7, and BOP AB-17 will be covered in Second Quarter Operator Requal training.
- 2) The procedures, 1/2BVS 0.5-3.DO.1, "ASME Requirement For Test of the Diesel Oil Transfer System", are being revised to chronologically locate the applicable sign-offs; this will ensure that testing is properly conducted and documented.

If your staff has any questions or comments concerning this letter, please refer them to Don Brindle, Regulatory Assurance Supervisor, at (815)234-5441 ext.2280.

*K.L. Graesser*  
for K. L. Graesser  
Site Vice President  
Byron Nuclear Power Station

KLG/DB/rp 9604230095 960417  
PDR ADOCK 05000454  
Attachment(s) Q PDR

cc: H. J. Miller, NRC Regional Administrator - RIII  
G. F. Dick Jr., Byron Project Manager - NRR  
H. Peterson, Senior Resident Inspector, Byron  
L. F. Miller Jr., Reactor Projects Chief - RIII  
D. L. Farrar, Nuclear Regulatory Services Manager, Downers Grove  
Safety Review Dept, c/o Document Control Desk, 3rd Floor, Downers Grove  
DCD-Licensing, Suite 400, Downers Grove.  
F. Niziolek, Division of Engineering - IDNS

*JFO*

## ATTACHMENT I

### VIOLATION (454/455-95013-03(a))

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings", requires, in part, that activities affecting quality to be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, on January 30, 1996, Byron station procedures (BOP AB-6 through 10) for restoration of the boric acid system were not of a type appropriate to ensure operation of the boric acid system after the system completed a maintenance period. The boric acid system operating procedures did not have a complete return to service electrical lineup to include the electrical knife switches, or a valve lineup to align the Unit 0 boric acid pump to either Unit 1 or Unit 2.

This is a Severity Level IV Violation (Supplement I).  
(50-454/455-95013-03(a) (DRS))

### REASON FOR THE VIOLATION

At Byron, the three Boric Acid Transfer Pump Motors (Unit 1, 2, and 0) each have an electrical power supply cord to be used between two 480V manual disconnect boxes (Unit 1 and 2). The operator needs to use the power cord for plugging in to either a Unit 1 or a Unit 2 power source, as necessary.

At the time of system restoration, the operators did not have an adequate procedure that clearly prescribed the proper electrical line-up of the Unit 0 Pump. The procedure did not clearly delineate the proper actions for either the power supply cords or the disconnect box energization. Specifically, the Boric Acid Operating Procedure contained detailed instruction for valve alignment but inadequate guidance with regards to the power cord.

### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A new operating procedure, BOP AB-17, "Aligning Boric Acid Transfer Pumps, was written. This procedure outlines the steps to both mechanically and electrically align the U-0 Boric Acid Transfer Pump to the U-1 or U-2 Boric Acid Tank. The procedure specifies operator actions for connecting the U-0 Boric Acid Transfer Pump power supply cord in relation to the U-1 or U-2 Boric Acid Transfer Pump 480V manual disconnect box. Additionally, the Disconnect Box is called out for turning on or off at the proper times for realignment.

As a more comprehensive measure, operating procedures BOP AB-6, "Transfer of the Boric Acid Batching Tank to U-1 Boric Acid Tank" and BOP AB-7, "Transfer of the Boric Acid Batching Tank to Unit 2 Boric Acid Tank" were enhanced for inclusion of proper electrical line-up

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

This event and procedural enhancements will be covered in Second Quarter Operator Requal training. (454-100-95-01303A-01).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 04/02/96 when procedures BOP AB-6, BOP AB-7, and BOP AB-17 were revised and approval for use granted.

## ATTACHMENT II

### VIOLATION (454/455-95013-03(b))

10 CFR 50 Appendix B, Criterion V, "Instructions, Procedures, and Drawings", requires, in part, activities affecting quality to be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, on January 3, 1996, Byron surveillance procedure BVS 0.5-3.DO.1, "ASME Requirement for Test of the Diesel Oil Transfer System," was not of the type appropriate to the circumstances. The surveillance procedure allowed verification of check valve operation without the opposite pump running, contrary to the procedure's acceptance criteria.

This is a Severity Level IV violation (Supplement I).  
(50 454/455-95013-03(b) (DRP))

### REASON FOR THE VIOLATION

This violation was the result of sign-off steps being placed in chronologically incorrect locations in procedures 1/2BVS 0.5-3.DO.1, "ASME Requirement for Test of the Diesel Oil Transfer System".

The misplaced sign-off steps document verification that the Diesel Oil Transfer Pumps' Discharge Check Valve is seated by verifying that the idle Diesel Oil Transfer Pump is not rotating backwards. This verification should be (and is) conducted while the opposite Diesel Oil Transfer Pump is running. Procedurally however, the sign-off followed the shutdown of the running Diesel Oil Transfer Pump, implying that the check valve was tested while both Diesel Oil Transfer Pumps were secured.

For this reason, Byron Station is confident that the required testing has been properly performed and that the deficiency exists only in the method of documentation.

### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The test procedure was discussed with the System Engineer and it was determined that the idle Diesel Oil Transfer Pumps' Discharge Check Valve position was always verified while the redundant Diesel Oil Transfer Pump was running.

In addition to the Diesel Oil Transfer Pump reverse rotation verification, the procedure directs the performer to record the discharge pressure of the idle Diesel Oil Transfer Pump before and during operation of the Diesel Oil Transfer Pump being tested. Although not intended to satisfy the IST program requirements for check valve backflow tests, this information can be used to confirm the results of the reverse rotation verification.

Upon discovery of the procedural deficiency, the System Engineer reviewed the results of previous surveillances to ensure that there were no significant pressure increases observed at the discharge of the idle Diesel Oil Transfer Pumps.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

The procedures, 1/2BVS 0.5-3.DO.1, "ASME Requirement For Test of the Diesel Oil Transfer System", are being revised to chronologically locate the applicable sign-offs; this will ensure that testing is properly conducted and documented. (NTS# 454-100-95-01303B-01)

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by June 1, 1996 upon completion of 1/2BVS 0.5-3.DO.1 procedure revisions.