



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

February 19, 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 Nos. 50-454/84-76
and 50-455/84-51

Reference (a): January 17, 1985 letter from R. L.
Spessard to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the report of an inspection at Byron Station by Messrs. Connaughton, Grant, and Ulie. During that inspection it was determined that certain activities were not in compliance with NRC requirements. No response was requested for item 1 in the Notice of Violation which was appended to reference (a). Attachment A to this letter contains Commonwealth Edison's response to item 2 in the Notice of Violation. This response also explains the actions which will be taken to prevent similar occurrences at Braidwood Station.

The report of this inspection contains a lengthy discussion of the Commonwealth Edison quality assurance program as it relates to fire protection features. We expect that additional discussions will be necessary to clarify our program. We anticipate that this matter will be explored further in future inspections.

Please direct further questions regarding these matters to this office.

Very truly yours,

T.R. Tramm
for

D. L. Farrar
Director of Nuclear Licensing

lm

cc: Byron Resident Inspector

Attachment

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ATTACHMENT 1

RESPONSE TO NOTICE OF VIOLATION

VIOLATION

10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings...."

Contrary to the above, there was no instruction, procedure, or drawing which ensured the timely review of radiation seal substitutions.

Corrective Action Taken and Results Achieved

All conduit seals at Byron with radiation shielding requirements which contained a substitute sealant without architect/engineer approval were transmitted by Transco to the architect/engineer for design review and approval on December 27, 1984. All substituted seals have been reviewed and dispositioned by the architect/engineer. No subsequent radiation seal substitution was made after that date without prior architect/engineer approval.

No conduit seals have been installed at Braidwood.

Corrective Action Taken to Avoid Further Noncompliance

For Byron, Note 12 on drawing No. 6E-0-3600 was revised by Engineering Change Notice P-33 dated January 3, 1985, to require architect/engineer review prior to installation for any radiation seal that cannot be installed at the barrier wall or floor as designed. Seals which cannot be installed as designed will be transmitted to the architect/engineer for disposition by means of a problem sheet in accordance with Transco's procedure PSQAP 6.0 supplement paragraph A, Rev. 0 dated 12/07/84.

For Braidwood, a corresponding change will be made to drawing 20E-0-3600 and contractors procedures will include a "Field Problem Sheet" similar to Byron's which will have a sign-off for the AE's resolution of field problems, including seal substitution request.

Date When Full Compliance Will Be Achieved

January 3, 1985.