

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) BYRON, UNIT 1	DOCKET NUMBER (2) 050004154	PAGE (3) 1 OF 012
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TITLE (4)
FIRE PROTECTION DETECTORS DOCUMENTATION ERROR

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	
02	04	85	85	018	00	03	01	85	DOCKET NUMBER(S) 050000	

OPERATING MODE (9) **2**

POWER LEVEL (10) **0100**

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: Check one or more of the following (11):

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(a)	<input type="checkbox"/> 20.736(c)(2)(iv)	<input type="checkbox"/> 72.71(b)
<input type="checkbox"/> 20.406(b)(1)(D)	<input type="checkbox"/> 20.306(a)(1)	<input type="checkbox"/> 20.736(c)(2)(vi)	<input type="checkbox"/> 72.71(d)
<input type="checkbox"/> 20.406(b)(1)(E)	<input type="checkbox"/> 20.306(a)(2)	<input type="checkbox"/> 20.736(c)(2)(vii)	OTHER (Specify in Abstract below and in Part V of Form 308A)
<input type="checkbox"/> 20.406(b)(1)(F)	<input checked="" type="checkbox"/> 20.736(c)(1)	<input type="checkbox"/> 20.736(c)(2)(viii)(A)	
<input type="checkbox"/> 20.406(b)(1)(G)	<input type="checkbox"/> 20.736(c)(1)(B)	<input type="checkbox"/> 20.736(c)(2)(viii)(B)	
<input type="checkbox"/> 20.406(b)(1)(H)	<input type="checkbox"/> 20.736(c)(1)(C)	<input type="checkbox"/> 20.736(c)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Carlos Diaz, System Test Engineer, Ext. 659	TELEPHONE NUMBER
	AREA CODE: 815 NUMBER: 234-5441

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC
E				N					

SUPPLEMENTAL REPORT EXPECTED (14)

YES NO

EXPECTED SUBMISSION DATE (15):

MONTH	DAY	YEAR

ABSTRACT (Limit to 1000 spaces & approximately 1/3 page length) (16)

The number of fire detectors installed in the Fuel Handling Building, although acceptable for fire protection, was not consistent with the number in the effective revision of the Architect Engineer's (AE) detector layout prints and with the revision of the plant's Technical Specifications in force up to February 17, 1985. Consequently the plant was in violation of the Tech. Specs from the license date of 10/31/84 through 12/21/84 when a fire watch was established per another LCO action requirement. The violation was discovered as a result of a fire protection surveillance on 2/4/84. The applicable Tech. Spec. action statement was verified when the violation was noted. The AE's detector prints were revised to reflect actual detector layout, and the current revision of the Tech. Specs also reflects the actual layout.

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PDR ADDOCK 05000454
S PDR

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) BYRON UNIT 1	BUCKET NUMBER (2) 0 5 0 0 0 4 5 4	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8 5	— 0 1 8	— 0 0 0	2	OF 0 2

TEXT (If more space is required, use additional NRC Form 386A's) (17)

During the performance of a semi-annual surveillance of fire detection instruments on February 4, 1985, it was noted that the number of detectors installed in the Fuel Handling Building was not consistent with the number shown in the effective revision of the AE detector layout print nor the effective version of the plant's Technical Specifications. The deviation between the design and as built condition was initially identified during Pre-Operational inspection prior to the issuance of low power license NPF-23. At that time the AE was requested to revise the detector layout prints to reflect "As-Built" conditions. As Tech Specs were not then in effect, the Action statement was not required to be entered. The existing number of detectors was reviewed by the AE, Station Fire Protection Engineer and Marsh and McLennan Protection Consultants and determined to provide the required fire protection for the affected area. The Technical Specifications issued with the full power license, NPF-37, reflect these "as-built" conditions.

A prefuel load deviation report was written to document the missing detectors. An Action Item Record, the station's internal commitment tracking mechanism, was not initiated to document the need for a fire watch to be established before entering Mode 6. As a result the Tech Spec impact of the the missing detectors was overlooked and the violation of Tech Specs occurred.

As a result of the discrepancy in the actual number of detectors and the number specified in the Technical Specifications then in effect, the station was in violation of TS 3.3.3.7 beginning October 31, 1984, the effective date of the low power license. Compliance with the action statement of TS 3.3.3.7 was achieved when a fire watch was establish due to a breached fire barrier on December 21, 1984. During this interval, the plant conducted its initial fuel load and was conducting its Post-Core Load Pre-Critical Test Sequence. Full compliance with the LCO was achieved on the issuance of the full power license and the revised Technical Specifications.

Based on the analysis conducted by the AE, Fire Protection Engineer, and Protection Consultant it was determined that sufficient fire detection capability existed at all times and the safety of plant and public was not affected.

This is the first occurrence of a deviation between the number of existing and required instrumentation resulting in a Technical Specification violation.



Commonwealth Edison
Byron Nuclear Station
4450 North German Church Road
Byron, Illinois 61010

March 1, 1985

LTR: BYRON 85-0327

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Dear Sir:

The enclosed Licensee Event Report from Byron Generating Station is being transmitted to you in accordance with the requirements of 10CFR50.73(a)(2)(i) which requires a 30 day written report.

This report is number 85-018-00, Docket No. 50-454.

Very truly yours,

R. E. Querio
Station Superintendent
Byron Nuclear Power Station

REQ/vda

Enclosure: Licensee Event Report No. 85-018-00

cc: J. G. Keppler, NRC Region III Administrator
J. Hinds, NRC Resident Inspector
INPO Record Center
CECO Distribution List

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