

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



October 24, 1996

LTR: BYRON 96-0270  
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. 50-454/96006; 50-455/96006  
NRC Docket Numbers 50-454, 50-455

REFERENCE: James L. Caldwell letter to Mr. Graesser dated  
September 24, 1996, transmitting NRC Inspection  
Report 50-454/96006; 50-455/96006

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. Revise BAP 1100-3 to only allow water tight doors to be open a reasonable amount of time for personnel rounds, materiel/equipment passage or when an impairment is in place for the door.
2. Training on the revised BAP 1100-3 will be given to all maintenance, operations, engineering, radiation protection, security, regulatory assurance, site quality verification, and contractor personnel.
3. Change the signage on all the water tight doors to agree with the new administrative requirements of BAP 1100-3.
4. Site Engineering will evaluate various engineered barriers and present them to the Technical Review Committee.

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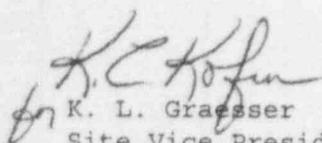
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If your staff has any questions or comments concerning this letter, please refer them to Don Brindle, Regulatory Assurance Supervisor, at (815)234-5441 ext. 2280.

Respectfully,



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

KLG/DB/rp

Attachment(s)

cc: A. B. Beach, NRC Regional Administrator - RIII  
G. F. Dick Jr., Byron Project Manager - NRR  
S. D. Burgess, Senior Resident Inspector, Byron  
R. D. Lanksbury, Reactor Projects Chief - RIII  
F. Niziolek, Division of Engineering - IDNS  
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.

## ATTACHMENT I

### VIOLATION (454/455-96006-01)

10 CFR Part 50, Appendix B, Criterion XVI, Corrective Action, requires, in part, that the cause of a condition adverse to quality be determined and corrective action be taken to preclude repetition.

Auxiliary building floor drain sump room doors are part of the station's flooding analysis and are described in the FSAR. They specifically protect the essential service water pump rooms from a pipe break in the floor drain sump room.

Contrary to the above, the corrective actions resulting from the discovery of an open auxiliary building floor drain sump room door on February 22, 1996, event were ineffective in preventing a recurrence of this condition on July 15, 1996 (50-454-96006-01).

This is a Severity Level IV violation (Supplement I).

### REASON FOR THE VIOLATION

The cause of the event on February 22, 1996, was indeterminate. It was most likely caused by a lack of self-checking (Inattention to Detail). Discussions with the work groups involved couldn't recall if the door was open or closed when they left. Whoever let the door open, failed to check that it was closed before leaving the area. Since there is signage on the doors, regarding administrative requirements, this was determined to be an isolated incident. The only corrective action was to discuss this event with the affected work groups.

There is an administrative requirement contained in BAP 1100-3, "Fire Protection Systems, Fire Rated Assemblies, Ventilation Seals, and Flood Seal Impairments." Limitations and Actions, item 6 states, "Water tight doors will be closed with the closure mechanism aligned in the 'closed' position except during passage or when the room is occupied." This was added to the procedure in Revision 8 dated September 26, 1990. The previous revision did not allow this. The revised requirement is less restrictive and allows for an increase in events where the doors are let open. The ability to let a water tight door open while the room is occupied is most likely increasing the number of events.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. The door was immediately closed to its proper position.
2. A training session was held with the Station Laborers and contracted decontamination technicians concerning requirements for watertight doors.
3. A Trend Investigation was performed to investigate methods of preventing this type of event from recurring by increasing the impenetrability of barriers to prevent letting the doors open.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

1. Revise BAP 1100-3 to only allow water tight doors to be open a reasonable amount of time for personnel rounds, materiel/equipment passage or when an impairment is in place for the door. NTS item 454-230-96-0027-03 will track this action.
2. Training on the revised BAP 1100-3 will be given to all maintenance, operations, engineering, radiation protection, security, regulatory assurance, site quality verification, and contractor personnel. NTS item 454-230-96-0027-04 will track this action.
3. After BAP 1100-3 is revised, change the signage on all the water tight doors to agree with the new administrative requirements. NTS item 454-230-96-0027-05 will track this action.
4. Site Engineering will evaluate various engineered barriers and present them to the Technical Review Committee. NTS item 454-230-96-0027-02 will track this action.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 7/15/96 when the watertight door was closed.