



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

October 31, 1994

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. 50-454/94020; 50-455/94020
NRC Docket Numbers 50-454, 50-455

Reference: Lewis F. Miller Jr. letter to Mr. Graesser dated
September 29, 1994, transmitting NRC Inspection
Report 50-454/94020; 50-455/94020

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 a Severity Level V violation requiring a written response. CECO's response is provided in the attachment.

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

Respectfully,

K. Graesser
Site Vice President
Byron Nuclear Power Station

cc: J. B. Martin, NRC Regional Administrator - RIII
G. F. Dick, 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

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ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 454/94020; 455/94020

VIOLATION (454(455)/94020-01)

During an NRC inspection conducted from July 22, 1994 to September 5, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1994) the violation is listed below:

Byron Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the activities associated with Fire Protection Program implementation.

Byron Administrative Procedures, BAP 1100-3, "Fire Protection Systems, Fire Rated Assemblies, Radiation, Ventilation, and Flood Seal Impairments," describes the steps necessary before impairing a Fire Protection Equipment/Component, for example fire doors, and to insure compensatory measures are taken during these impairments. Fire Protection Impairment Permit BAP 1100-T17 is required for all fire protection and sealing devices, which are impaired. This permit shall not be terminated until the equipment is restored to operable status. It also describes, that fire doors, dampers, etc., separating safety related systems or systems important to safe shutdown are required to be operable as defined by Administrative Technical Requirements.

Contrary to the above, on August 18, 1994, the inspector noted two fire doors D418 and D463 (non-essential switchgear room) missing the door sill and without impairment tags attached. Fire door D302 (radwaste control room entrance) was noted to be blocked open with a large fan, and the fire door for the radiological waste chiller room was blocked open with a trash can, with neither door having an impairment tag attached.

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

REASON FOR THE VIOLATION:

An audit was being performed on the Fire Protection Impairment Program (FPIP) in which all FPIP cards were being walked down to ensure they were still required. When the individual performing the audit reviewed the FPIP for doors D418 and D463, it stated the doors were impaired by being propped open to allow drain hoses to pass through. Since the doors were no longer being propped open the individual assumed the impairment was no longer required, when in fact it was in place due to the sills that had been removed so the doors would not have to be propped open.

The doors to the radwaste control room and radwaste chiller room were open to allow ventilation to cool the equipment in the radwaste control room. These fire doors, which were found blocked open without FPIP cards were done so under the assumption that a fire door is not impaired as long as it is closed and latched or capable of being closed and latched in the event of a fire, this is a Byron station interpretation. There were no FPIP cards hung on the doors because the radwaste control room is manned 24 hours a day, and thus the operator would be capable of closing the doors in the event of a fire.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The doors that were in question were immediately brought to the attention of the Fire Marshall and the proper impairment tagging was issued. The ventilation system for the radwaste control room was repaired and the doors closed.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

A trend will be investigated with regards to adherence to the stations administrative procedures, included in this will be BAP 1100-3. This investigation will determine the root cause(s) to these problems and corrective actions needed to prevent them from occurring in the future. A supplement to this violation response will be written when the investigation is complete.

A priority list of the fire doors that require maintenance has been assembled. These doors are being repaired and as doors become impaired they are being added to the list. A housekeeping maintenance repair crew will be formed on 12/01/94. This crew will ensure minor door repairs are completed in a timely manner, major repairs will be dealt with through the normal process.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on August 18, 1994 when the doors in question were tagged with FPIP cards.