



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

AMB

January 29, 1986

Mr. James G. Keppler
 Regional Administrator
 U.S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Subject: Byron Station Unit 1
 I&E Inspection Report No. 50-454/85-056

Reference (a): December 31, 1985 letter from
 C. E. Norelius to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of an inspection by Messrs. Hinds, Jr. and Brochman at Byron Station on December 2-13, 1985. During this inspection, certain activities were found to be in violation of NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation appended to reference (a).

Please direct any questions regarding this matter to this office.

Very truly yours,

D. L. Farrar
 Director of Nuclear Licensing

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Attachment

cc: Byron Resident Inspector

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ATTACHMENT A

VIOLATION

Technical Specification 6.8.1.a states, in part: "Written procedures shall be established. . . covering the activities referenced . . . for. . . the applicable procedures as recommended in Appendix A, of Regulatory Guide 1.33, Revision 2, February 1978."

Regulatory Guide 1.33, Revision 2, Appendix A, Section 8.b(1)(w) requires that a specific procedure for Heat Balance - Flux Monitor Calibrations should be written.

Byron Operating Surveillance 1BOS 3.1.1-2, "Calorimetric Calculation Surveillance," implements this requirement.

Appendix B to 10 CFR 50 requires activities affecting quality to be prescribed by procedures appropriate to the circumstances.

Contrary to the above, on February 2 through August 6, 1985, while in Modes 1 or 2, the procedure to calibrate the Nuclear Instrumentation Power Range Channels was not appropriate to the circumstances in that this procedure did not include the Feedwater Tempering Line Flowrate.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

A temporary change to the Calorimetric Calculation Surveillance (1BOS 3.1.1-2) was immediately issued to include feedwater tempering line flow in the heat balance. The procedure was subsequently permanently revised. A comprehensive investigation was conducted to determine if the reactor thermal power limits were ever exceeded as a result of the discrepancy in the calorimetric calculation. The results of this investigation indicated that the reactor thermal power limits were never exceeded.

On December 31, 1985, a calorimetric calculation was programmed into the plant process computer to give control room operators the option of performing this surveillance with the computer.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

Byron Operating Procedures are currently being reviewed in accordance with the Byron/Braidwood procedure standardization program. The scope of this program includes operating surveillances, procedures, emergency procedures, abnormal procedures, annunciator responses, general procedures, and the 300 series of the administrative procedures. In this program, each station performs a thorough review of the other station's

procedures. Comments and concerns on each procedure raised in this review are jointly reconciled and one common procedure is generated. This procedure is then processed through the review structure of each station. Although the primary purpose of this program is procedure standardization, the end result is that each of the procedures within the scope of this program receives additional reviews and approvals. This program began in June, 1985 and is currently scheduled to be completed in April, 1986. At the time the feedwater tempering line flow omission was discovered, the Calorimetric Calculation Surveillance had not yet been through the procedure standardization program.

In addition to the procedure standardization program, Byron Unit 1 procedures will, in effect, receive an additional review when these procedures are used as the basis for developing the Byron Unit 2 procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Calorimetric Calculation Surveillance was revised to include feedwater tempering line flow on August 7, 1985.