



Commonwealth Edison
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Address Reply to: Post Office Box 767
Chicago, Illinois 60690

January 27, 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 2
IE Inspection Report No. 50-455/85-045

Reference (a): December 27, 1985 letter from C. J. Paperiello
to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of an inspection at Byron Station by Messrs. Ring, Forney, and Ms. Malloy on December 2-6, 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).

This violation involved a discrepancy in the acceptance criteria of a Unit 2 preoperational test procedure that has not yet been executed. Since this procedure was never used in the performance of preoperational testing, we believe the variation in the acceptance criteria was of minor significance. Accordingly, we request the NRC to consider reclassifying this violation as Severity Level V.

Please direct any questions regarding this matter to this office.

Very truly yours,

K. A. Ainger

for

D. L. Farrar
Director of Nuclear Licensing

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Attachment

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PDR ADOCK 05000455
Q PDR

cc: Byron Resident Inspector

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ATTACHMENT A

VIOLATION

10 CFR 50, Appendix B, Criterion XI as implemented by the Commonwealth Edison Quality Assurance Manual, Quality Requirement 11.0, and the Byron Startup Manual requires that a test program be established. This test program is required to demonstrate that systems and components will perform satisfactorily in service by performance of written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above, Unit 2 preoperational test SI 73.62, "Safety Injection - Flow Balance", was written and approved with inappropriate acceptance criteria in that the test required the centrifugal charging, safety injection, and residual heat removal pumps to equal or exceed the head versus flow performance curves from the vendor's shop tests.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The acceptance criteria in preoperational test SI 73.62 regarding pump performance are being modified to reference the pumps' minimum acceptance curve instead of the vendor shop performance curve.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

For future tests, the minimum acceptance curve will be used as acceptance criteria in lieu of the vendor shop performance curve, where available and applicable. We believe the Unit 2 test reviews conducted under the Byron Unit 1 Lessons Learned Program and the 30-day prior to performance review will assure the appropriate acceptance criteria are used in the Unit 2 preoperational test procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The acceptance criteria in test SI 73.62 were modified on January 13, 1986.