



Commonwealth Edison

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February 13, 1986

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

Subject: Byron Station Units 1 and 2
I&E Inspection Report Nos.
50-454/85-049 and 50-455/85-034

Reference (a): January 16, 1986 letter from C. J. Paperiello
to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of a fire protection inspection at Byron Station by Mr. Ramsey in November, 1985 through January, 1986. During this inspection, an unresolved item was identified concerning the control of welding and cutting activities. Attachment A to this letter contains Commonwealth Edison's response to this unresolved item.

Please direct any questions regarding this matter to this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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Attachmen

cc: Byron Resident Inspector

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ATTACHMENT A

RESPONSE TO UNRESOLVED ITEM

During this inspection, the control of welding and cutting activities was reviewed by the NRC inspector. As noted in paragraph 3a of the inspection report, Byron Station has a commitment to comply with NFPA Standard 51B regarding welding, cutting and grinding activities.

This commitment has been addressed by administrative controls implemented by the Project Construction Department and Byron Station Maintenance Department. For the Project Construction Department, Byron Site Instruction (BSI) No. 104-5 has been developed. For the Byron Station Maintenance Department, Byron Maintenance Procedure BMP 3101-5 has been developed. We believe these procedures meet the requirements of NFPA-51B.

As allowed by NFPA-51B, Commonwealth Edison management has delegated the authority to issue cutting, welding and burning permits to the Station/ Contractor Supervisors in charge of the work. In addition, for certain designated areas defined in the aforementioned procedures, the supervisor authorizing the work must also obtain the Shift Engineer's (or his designees) signature of notification and concurrence before proceeding with the work.

Nevertheless, Byron Station and the Project Construction Department have reviewed procedures BMP 3103-5 and BSI 104-5 and concluded that some enhancements can be made to these administrative controls. In addition to the ten areas that are presently identified in procedures BMP 3101-5 and BSI 104-5 as requiring the Shift Engineer's (or his designees) notification and concurrence prior to the work being performed, three other areas are being added to this list. These areas are the ESF switchgear rooms, the remote shutdown panel rooms and the fire protection diesel and day tank room.

In addition, the welding, cutting and grinding permits used in the current procedures will be revised to include a checklist to address the specific precautions that must be taken to prevent fires. Station/Contractor Supervisors will assure compliance with these precautions prior to starting the work.

The revisions to procedures BMP 3101-5 and BSI 104-5 will be completed by March 7, 1986.

The contractor personnel involved in the specific incident discussed in the inspection report have been reinstructed concerning the administrative controls for welding and grinding activities. The requirements for a fire watch to be present during welding/grinding activities as well as the responsibilities of the individual designated as the "fire watch" were re-emphasized.