



**Commonwealth Edison**

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February 14, 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  
IE Inspection Report  
No. 50-454/85-048

Reference (a): December 15, 1985 letter from L. A. Reyes  
to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of an inspection by Mr. Wohld at Byron Station on October 28 through November 7, 1985. During this inspection, certain activities appeared 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). On January 9, 1986, Commonwealth Edison was granted a thirty-day extension on the due date for the response to the Notice of Violation.

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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cc: Byron Resident Inspector

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## ATTACHMENT A

### VIOLATION

Appendix B of 10 CFR 50, Criterion III, requires that measures be established to assure that the design basis for safety-related components are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, specifications, drawings, procedures, or instructions were not written to accurately or adequately specify motor-operated valve setup, maintenance, or testing to assure that valve operations would be within the design basis for the plant.

### RESPONSE

Commonwealth Edison believes the design basis for safety related motor operated valves has been properly translated, to the extent possible, into design documents such as specifications and drawings. At issue in this violation is the level of design information available in the field for assuring geared limit switches in a valve operator are properly set. In the design phase, it is not possible to predict the settings for all the geared limit switches in the valve operator when taking into account valve specific variables such as packing tightness. However, Commonwealth Edison believes the general guidance provided in the design documents is adequate for field setting the geared limit switches when used in conjunction with field procedures that supplement the design information.

This process for initial valve setup is further validated by preoperational testing of valves at Byron Station. Consistent with the guidance in NRC IE Bulletin 85-03, certain valves in the charging-safety injection, safety injection, and auxiliary feedwater systems have been preoperationally tested under design basis differential pressure conditions. This testing verified the limit switch settings for these valves and validated the method used for setting the limit switches.

### CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

A procedure has been written to control the initial setup of valve limit switches by construction personnel. This procedure will assure consistency in the technique used by personnel involved with the initial setup of valve motor-operators.

In addition, procedures for maintenance activities on motor-operated valves (MOV's) have been enhanced to provide more assurance of proper limit switch settings. INPO guidelines regarding the setting of geared limit switches have been incorporated into the Byron Station electrical maintenance procedure governing this activity. The procedure revision includes more specific guidance for switch settings. This procedure has also been revised to include steps to verify that backseating of the valve disc will not occur.

More stringent controls have been established for tightening valve packing on safety related MOV's. This work must be performed under the Nuclear Work Request program. In this program, the Shift Supervisor/ Operating Engineering reviews the maintenance performed and determines what testing should be performed to check operability of the valve. Quality control review of the maintenance activities is also included.

#### CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

We believe the actions discussed above will assure that valve operations will be within the design basis of the plant. Further enhancements to the overall program to assure valve operability are being studied in response to NRC IE Bulletin 85-03. In particular, improved techniques to verify the proper setting of the torque switch bypass limit switch are under consideration. The results of this effort will be reported in the response to the Bulletin.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The procedure to control the initial setup of valve limit switches was written by November 13, 1985. The enhancements to the maintenance procedures for adjusting limit switches in MOV's were completed by January 10, 1986. The more stringent controls for tightening valve packing were established on January 18, 1986.

Commonwealth Edison's response to NRC IE Bulletin 85-03 will be issued by May 15, 1986.