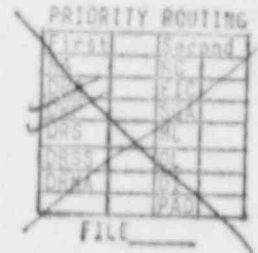




Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690 - 0767

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September 19, 1988



Mr. A. Bert Davis
 Regional Administrator
 U.S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL. 60137

Subject: Byron Station Units 1 and 2
 NRC Inspection Report Nos.
 50-454/88-011 and 50-455/88-011
NRC Docket Nos. 50-454 and 50-455

Reference (a): August 19, 1988 letter from E.G. Greenman to Corcell Reed

Dear Mr. Davis:

Reference (a) provided the results of an inspection by Mr. P.G. Brochman and Ms. N.V. Gilles of your office on July 1 through August 15, 1988, of activities at Byron Station Units 1 and 2. During this inspection, certain activities were found in violation of NRC requirements. Attachment A of this letter contains Commonwealth Edison's response to the Notice of Violation. Reference (a) also expressed a concern regarding the implementation of the modification program at Byron Station. Attachment B contains the actions that have been taken and will be taken to permanently improve the modification program and ensure that documents are properly updated during the modification process.

Please direct any questions regarding this matter to this office.

Very truly yours,

Henry E. Bliss
 Nuclear Licensing Manager

RAC/klj
 att.

cc: Byron Resident Inspector

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ATTACHMENT A
Violation 454/880-11-01
455/88011-01

Technical Specification 3.7.5 requires that two independent ultimate heat sink (UHS) cooling towers shall be operable in Modes 1 to 4 with one operable essential service water makeup pump per train. With one essential service water makeup pump inoperable, action statement c requires the licensee to restore the affected pump to operable status within 72 hours, or be in Mode 3 within the next 6 hours and Mode 5 within the following 30 hours.

Final Safety Analysis Report paragraph 9.2.5.5 specifies that each basin in the cooling tower have a category I level switch and that, in the event of low water level in the basin, the corresponding essential service water makeup pump be automatically started.

Contrary to the above, from June 10 through June 16, 1988, with Units 1 and 2 in Mode 1, level switch OLS-SX097 for the OB basin was deenergized, thereby rendering the OB essential service water makeup pump incapable of starting automatically on low (UHS) basin water level for greater than 72 hours, and Units 1 and 2 were not shutdown and placed in Mode 5 within the following 36 hours.

Corrective Action Taken and Results Achieved

The OB SX Makeup pump was returned to operable state at 2001 on June 16, 1988, when the breaker MCC132Z1 Cub D2-04 was placed in the ON position as documented in LER 88-003.

Corrective Action to be Taken to Avoid Further Violation

1. An initial review of the Electrical Distribution Book (EDB) was performed to determine accuracy. Results indicated the following:
 - a. The 6.9KV, 4KV and 480V distribution information reflects as-built status of Byron and can be used for OOS information.
 - b. Several discrepancies were found in the 120V distribution information contained in the EDB. Because of these discrepancies the station implemented the following immediate actions:
 - 1) A caution statement has been placed on the EDB copies to ensure that prints are used instead of the EDB for 120V feed OOS information.
 - 2) Because the Outage Editor data base is constructed from the EDB, a Special Operating Order #SO-ST-0048 was issued to ensure that prints were used instead of the Outage Editor for 120V feed information for OOS.

2. The EDB is under a 100% validated review at this time and will not be used for determining OOS for 120V feeds until the validation is complete.
3. Procedural controls are being revised to ensure control of the EDB (BAP 500-13 is being written to replace BVP 600-02).
4. The pertinent sections of Inspection Report 454/88011 were reviewed in depth by Tech Spec System Engineers involved in the modification process in order to raise sensitivities regarding procedural compliance.

Full Compliance Date

1. Initial review of the EDB was completed on August 25, 1988.
A caution statement was placed on the EDB on August 25, 1988.
Special Operating Order SO-ST-0048 was issued on September 9, 1988.
2. 100% validation of the EDB will be completed by June 1, 1989.
3. BAP 500-13 will be approved for use by October 1, 1988.
4. The Tech Staff review of the inspection report was completed on September 8, 1988.

Modification Program Review

The following discussion addresses concerns regarding the less than adequate performance of the modification program to ensure that the procedures and instructions which are utilized by the control room operators to determine system status, to take equipment out-of-service and to ensure compliance with the operability requirements of the Technical Specifications are up-to-date and correct.

The lessons learned from events at Zion and Dresden Stations prompted a review of the Byron Station Modification Program in January 1988.

The review resulted in rewriting the Station Modification Program (BAP 1610-series). This was completed and approved for use on June 9, 1988. Byron Station has every confidence that these changes will ensure various documents are properly updated during the modification process. The violation identified during this inspection was the result of a modification performed prior to the rewrite of the Station Modification Program.

One of the major enhancements to the modification program was a revision to the modification station check list (BAP 1610-8T1) that specifically addresses updating the electrical distribution book, valve lineups, procedures, and other items utilized by the control room operators. Problems may exist, however, with modifications completed prior to this revision, such as those identified in Notices of Violation 454/88007-02 and 454/88011-01.

Byron Station will compare a selected number of completed safety related modification packages to the new modification program to ensure all necessary documents were properly updated. The program to perform this review will be developed by October 15, 1988. An initial sample size of 20% for modifications which were operation authorized between August 1, 1987 and September 1, 1988, will be reviewed by December 31, 1988. The sample size will be increased by 20% if any discrepancies are found.

Additionally, the station is backfitting modifications being performed during the Unit 1 refueling outage with the modification station checklist (BAP 1610-8T1). This backfit will ensure critical documents required for operation are updated.

The new modification program and planned actions were discussed with the Byron Station Senior Resident Inspector on September 13, 1988.