

## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

OCT 0 4 1988

Docket No. 50-454

Mr. Cordell Reed Senior Vice President Commonwealth Edison Company P.O. Box 767 Chicago, Il 60609

Dear Mr. Reed:

This letter is to inform you of the NRC's concern regarding a recent event at Byron Unit 1. On September 19, 1988, the Unit 1 reactor vessel was inadvertently drained to the point where the residual heat removal pump cavitated and was declared inoperable.

Since December 12, 1986, the NRC has issued four information notices and a generic letter which discussed loss of decay heat removal events during refueling operations. Generic Letter 87-12 identified 37 Loss of Decay Heat Removal events which occurred from 1977 through April 1987. These events were attributed to inadequate reactor coolant system level. The four information notices (86-101, 87-23, 87-46, and 88-36) identified use of erratic and/or inaccurate reactor vessel level instrumentation as a significant cause for the loss of decay heat removal capability during low reactor coolant level operations and discussed operators mistrust of such instruments, in general. Although your operators may have properly mistrusted the level instrumentation available to them, it is evident that they were relying upon a makeshift procedure that had not been properly developed and reviewed.

Although no personnel were injured and a radioactive release did not occur, we are concerned about the apparent failure to factor previous industry lessons learned, transmitted by generic correspondence, into plant procedures and practices. It is our understanding that both your corporate and individual plant staffs routinely review generic correspondence to ensure that lessons learned from events are evaluated for applicability and that a determination is made of whether actions to preclude such occurrences are warranted at your facilities. It is apparent that the evaluation of loss of decay heat removal events was not effective in preventing the Byron Unit 1 event, and it raises broader questions regarding the general effectiveness of incorporating lessons learned into your plant operating procedures.

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We would be interested in learning your views of how incidents such as this can be prevented in the future.

Sincerely.

Original signed by Thomas E. Murley

Thomas E. Murley, Director Office of Nuclear Reactor Regulation

A. B. Davis, Regional Administrator Region III

cc: Z. Pate, INPO

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## \*SEE PREVIOUS CONCURRENCE

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Sincerely,

Thomas E. Murley, Director Office of Nuclear Reactor Regulation

Thomas & Meuley

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