



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

DMB

May 1, 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. 50-455/86-004
NRC Docket No. 50-455

Reference (a): April 3, 1986 letter from F. F. Warnick
 to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of an inspection at Byron Station Unit 2 on January 16 through March 17, 1986. During this inspection certain activities were found in violation of NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation appended to reference (a).

Please direct any questions regarding this matter to this office.

Very truly yours,

D. L. Farrar
 Director of Nuclear Licensing

lm

Attachments

cc: Byron Resident Inspector

1643K

8605060158 860501
 PDR ADOCK 05000455
 G PDR

TEOI

MAY 2 1986

ATTACHMENT A

VIOLATION 1

The Byron FSAR, Appendix A commits to Regulatory Guide 1.39, Revision 2. Regulatory Guide 1.39, Revision 2 endorses ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants".

ANSI N45.2.3-1973, Section 2.1 requires that cleanliness requirements for housekeeping activities shall be established on the basis of five different zones (levels) of cleanliness. Cleanliness Zone II is an intermediate cleanliness area where foreign matter may have detrimental effects and requires the use of clean gloves, shoe covers, head covering, material accountability, personnel accountability, and no use of tobacco or eating.

Contrary to the above, on February 23, 1986, during the performance of preoperational test EF 2.26.61, "ECCS Full Flow" six individuals (three of whom were supervisors) were observed to be in the Level II Cleanliness Zone at the Containment ECCS Recirculation Sumps and were not wearing the required protective clothing (clean gloves and head coverings).

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The Test Coordinator was informed and immediate actions were taken to have the individuals involved don the appropriate protective clothing. When the testing section was complete, the sump area was cleaned again and Zone II cleanliness was verified prior to continuing with the test.

CORRECTIVE ACTION TO AVOID FURTHER VIOLATION

All individuals working in the sump area for this test were reinstructed in the appropriate cleanliness requirements. In addition, a sign was posted in the area which detailed the cleanliness requirements and the guard force involved was reminded of their responsibility to enforce the cleanliness standards.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on February 23, 1986 when the individuals involved donned the appropriate protective clothing.

VIOLATION 2

10 CFR 50, Appendix B, Criterion V, as implemented by the Commonwealth Edison Company's Quality Assurance Manual, Quality Requirement 5.0 requires that activities affecting quality shall be prescribed by documented instruction of a type appropriate to the circumstances and that these activities shall be accomplished in accordance with the specified instructions.

Byron Administrative Procedure BAP 330-2, "Temporary Alterations" implements these requirements and prescribes the administrative controls for the use of temporary alterations to all plant systems. Paragraph C.1.a(1) defines a temporary mechanical alteration as a temporary connection such as a hose, tubing or piping which joins two systems together. Paragraph C.3 prescribes the actions to remove an installed Temporary Alteration. These include: (1) Shift Engineer's approval to remove the Temporary Alteration; (2) the removing individual obtains the original of BAP 330-2T1, "Temporary Alteration Log Sheet", removes the Temporary Alteration and its tags, signs the original of BAP 330-2T1 and hand carries the original of BAP 330-2T1 and the tags to the control room supervisor; (3) an independent verification is then made that the Temporary Alteration has been properly removed and that the original of BAP 330-2T1 is signed to indicate this.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The temporary alteration was properly removed in accordance with BAP 330-2.

CORRECTIVE ACTION TO AVOID FURTHER VIOLATION

The test engineer involved was counseled by the Unit 2 Primary Group Leader regarding the temporary alteration administrative requirements. Further, the administrative requirements for temporary alterations were reiterated to Project Construction Department management and Unit 2 test engineers. In addition, a training session regarding temporary alteration administrative requirements was conducted with Project Construction Department personnel.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

On February 18, 1986, the temporary alteration was properly removed.