

Commonwealth Edison Company  
Byron Generating Station  
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August 25, 1997

**ComEd**

LTR: BYRON 97-0196  
FILE: 1.10.0101

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Document Control Desk

Subject: Byron Nuclear Power Station Units 1 and 2  
Response to Notice of Violation  
Inspection Report No. 50-454/97008; 50-455/97008  
NRC Docket Numbers 50-454, 50-455

Reference: Geoffrey E. Grant letter to Mr. Graesser dated  
July 23, 1997, transmitting NRC Inspection  
Report 50-454,97008; 50-455/97008

Enclosed is Commonwealth Edison Company's response to the Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited three (3) Severity Level IV violations requiring a written response. ComEd's response is provided in the attachment.

This letter contains the following commitments:

- 1) The corrective actions group will review procedures/processes for LER preparation to ensure it is clearly stated who has the responsibility to verify that NTS items are entered into the computer tracking system.
- 2) The AF System technical specification surveillance (2BOS 7.1.2.1.b-2) will be scheduled through work control not to be immediately preceded by the ASME surveillance (2BVS 0.5-3.AF.1-2).
- 3) A multi-disciplinary task force will be created to address the issue of preconditioning on a generic basis. The task force will develop a program designed to ensure that preconditioning prior to technical specification surveillances does not recur.

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- 4) The 2B AF Pump preconditioning event will be presented during Engineering, Operations, Maintenance, and Work Control training. The training will review how the event occurred, why the event occurred, and corrective actions taken to prevent recurrence.
- 5) Revising the maintenance alteration procedure (BAP 400-9) to incorporate the verbal commitment to the NRC to allow chart recorders to be connected for up to 24 hours without a temporary alteration and to ensure a person knowledgeable of the recorder and connections would be present onsite during the initial 24 hour period.

If your staff has any questions or comments concerning this letter, please refer them to Don Brindle, Regulatory Assurance Supervisor, at (815)234-5441 ext.2280.

Respectfully,

  
for K. L. Graesser  
Site Vice President  
Byron Nuclear Power Station

KLG/DB/rp

Attachment(s)

cc: A. B. Beach, NRC Regional Administrator - RIII  
G. F. Dick Jr., Byron Project Manager - NRR  
S. D. Burgess, Senior Resident Inspector, Byron  
R. D. Lanksbury, Reactor Projects Chief - RIII  
F. Niziolek, Division of Engineering - IDNS  
D. L. Farrar, Nuclear Regulatory Services Manager, Downers Grove  
Safety Review Dept, c/o Document Control Desk, 3rd Floor, Downers  
Grove  
DCD-Licensing, Suite 400, Downers Grove.

## ATTACHMENT I

### VIOLATION (454/455-97008-01)

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

LER 50-454/94014, "Diesel Generator (DG) inoperability in Mode 5 due to misinterpretation of TS requirements," committed to a corrective action of developing a technical specification interpretation (TSI) to clarify the requirements of DG inoperability when its supporting equipment was inoperable.

Contrary to the above, the inspectors identified that from October 17, 1994, until April 29, 1997, the corrective actions to conditions adverse to quality that were identified in LER 454/94-014 were not performed. Specifically the TSI had not been developed (50-454;455/97008-01(DRP)).

This is a Severity Level IV Violation (Supplement I).

### REASON FOR THE VIOLATION

Although Nuclear Tracking System (NTS) item numbers were assigned to the corrective actions, the data was not submitted or was overlooked that would have ensured its inclusion in the computer database. It is not known for sure how this occurred, since this event is three (3) years old. However, a review of the procedure governing LER preparation indicates it was not clear who was responsible for ensuring NTS items were entered into the database.

### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. The missing NTS items were entered into the computer database and completed, as appropriate.
2. All other corrective actions from LERs, beginning in 1994 to present, were verified to be in the computer tracking system.

### CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

1. The corrective actions group will review procedures/processes for LER preparation to ensure it is clearly stated who has the responsibility to verify that NTS items are entered into the computer tracking system. This action will be tracked by NTS item# 454-100-97-00801-01.

### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 5/21/97 when the TSI/G for "DG Operability for Modes 5 & 6" was written and approved.

## ATTACHMENT II

### VIOLATION (454/455-97008-02)

10 CFR Part 50, Appendix B, Criterion II, "Quality Assurance Program," requires, in part, that activities affecting quality shall be accomplished under suitably controlled conditions.

Contrary to the above, the inspectors identified on May 13, 1997, the 2B diesel driven auxiliary feedwater pump was not tested under suitably controlled conditions. Specifically, a manual start of the diesel engine was performed (preconditioning) immediately prior to an engineered safeguard feature start (50-454;455/97008-02(DRP)).

This is a Severity Level IV Violation (Supplement I).

### REASON FOR THE VIOLATION

On 5\13\97 at 0821 Byron station Unit 2 entered a LOCAR (2BOS 7.1.2-1A) on the 2B diesel driven Auxiliary Feedwater (AF) Pump to perform an ASME surveillance. During the performance of 2BVS (0.5-3.AF.1-2), ASME surveillance requirement for the 2B AF Pump, the overcrank lockout alarm annunciated during the attempted diesel start with the B battery bank selected. The overcrank alarm annunciated correctly at the local panel (2AF01J), after the 2B AF Pump failed to start within 4 starting cycles per 50 seconds. Per the startup procedure, BOP AF-7, if the engine overcrank alarm annunciates the other battery bank can be selected. The A battery bank was selected, and the 2B AF Pump started on the first crank. The ASME surveillance was completed satisfactorily and exited.

Operations started the 2B AF pump on the B battery bank per scheduled surveillance (2BOS 7.1.2.1.B-2) to support diagnostic troubleshooting on the overcrank alarm. The diesel started on the first crank. The start of the 2B AF Pump per (2BOS 7.1.2.1.B-2) was considered to be preconditioned due to the ASME surveillance preceding it. After the start with the B battery on the "hot" 2B AF Pump, the 2B AF pump was successfully started from an approximately ambient condition per BOP AF-7 with the B battery bank. Cell voltages on the B battery bank were successfully measured per (2BHS AF-1B). On the basis of successful completion of the above actions the LOCAR was exited on 5/13/97 at 2100.

### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. On 5/15/97 the 2B AF diesel was successfully started from an ambient condition.

### CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

1. The AF System technical specification surveillance (2BOS 7.1.2.1.b-2) will be scheduled through work control not to be immediately preceded by the ASME surveillance (2BVS 0.5-3.AF.1-2). This action will be tracked by NTS item #454-100-97-00802-01.

2. A multi-disciplinary task force will be created to address the issue of preconditioning on a generic basis. The task force will develop a program designed to ensure that preconditioning prior to technical specification surveillances does not recur. This action will be tracked by NTS item #454-100-97-00802-02.
3. The 2B AF Pump preconditioning event will be presented during Engineering, Operations, Maintenance, and Work Control training. The training will review how the event occurred, why the event occurred, and corrective actions taken to prevent recurrence. This action will be tracked by NTS item #454-100-97-00802-03.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 5/15/97 when the 2B AF diesel was started from an ambient condition.

### ATTACHMENT III

#### VIOLATION (454/455-97008-03)

10 CFR Part 50, Appendix B, Criterion III, "Design Control," requires, in part, that measures be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions. Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design.

Contrary to the above, the inspectors identified that from April 13, 1997, until April 28, 1997, the temporary alteration program was not adequate to ensure design control measures commensurate with those applied to the original design were implemented prior to connecting a strip chart recorder, a temporary system alteration, on the bus 211 battery charger for troubleshooting (50-454;455/97008-03(DRP)).

This is a Severity Level IV Violation (Supplement I).

#### REASON FOR THE VIOLATION

During troubleshooting activities on the Unit 2 125V DC ESF Battery Charger (211) under the direction of BAP 400-9, "Troubleshooting and Maintenance Alterations," a strip chart recorder was installed in order to troubleshoot the low voltage output that was occurring intermittently. During the troubleshooting activities, the battery charger was considered operable and the strip chart recorder was left installed for a period of about fifteen days. While the strip chart recorder was installed, the NRC resident raised a question as to whether the BAP 400-9 documentation for the installation was acceptable as is or if it should be a temporary alteration. The resident's question is based on the following: under the guidance of BAP 400-9, the installation of the strip chart recorder did not receive an engineering review for seismic and other related issues, and a review was not performed to determine the failure modes of the recorder while connected to the battery charger. If a temporary alteration had been performed, a detailed engineering review would be required, which would address all the concerns addressed by the NRC inspector.

Upon review of BAP 330-2, "Temporary Alterations," clear guidance on the installation of strip chart recorders on operable equipment could not be found. After contacting other plants within the ComEd system and the industry, it was determined that there were a variety of methods used, regarding strip chart recorders and temporary alterations, within the industry. Therefore, since both procedures did not provide clear guidance and industry contacts revealed some improvements could be made to Byron's programs, the policy for installation of strip chart recorders needed to be changed.

#### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. The temporary alteration procedure (BAP 330-2) was revised to allow chart recorders to be connected for up to 24 hours without a temporary alteration.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

1. Revising the maintenance alteration procedure (BAP 400-9) to allow chart recorders to be connected for up to 24 hours without a temporary alteration and to ensure a person knowledgeable of the recorder and connections would be present onsite during the initial 24 hour period. Equipment with engineering test points will not require a temporary alteration. NTS Item 454-100-97-00803-01 will track completion of this item.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 4/29/97 when the chart recorder monitoring equipment was removed.