

SEP 16 1987

Docket No. 50-454

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Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Senior Vice President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

Thank you for your letter dated August 21, 1987, informing us of the steps you have undertaken to correct the noncompliances which we brought to your attention in our letter dated July 9, 1987 regarding Commonwealth Edison's snubber reduction program at the Byron facility.

We have reviewed your responses to violation examples 1c, 2b and 2d and will examine these matters in a future inspection. We have also reviewed your responses contesting the validity of the violation examples 1a, 1b, 2a and 2c and the severity levels of the two violations. At this time we do not agree with portions of your response on the following basis:

With regard to Violation 1a, we do not agree with your statement that Nutech's walkdown requirements were never less than those previously committed to at Byron Station. The procedure revision that was being implemented through May 1987, only addressed those rattle points near critical areas (nozzles, branch lines and break locations) on the snubber reduction piping itself. At that time, absolutely no consideration was given for rattle points near critical areas on any adjacent piping systems. The flaw in the procedure that was not recognized by Commonwealth Edison was that during original construction, all of the rattle points near critical areas eventually would be reviewed since all of the piping was part of the program. For the snubber reduction program, however, a limited number of piping systems were involved and, as a result, not all potentially affected critical areas were reviewed. The procedure was eventually corrected by requiring all rattle points on the snubber reduction piping to be evaluated to verify that critical areas on adjacent piping systems were not adversely affected as well. This revision was only initiated after the NRC inspector identified the above deficiency. (It should be noted that Nutech revised its original "more extensive" walkdown procedure under the direct guidance of Commonwealth Edison.) Although the procedure was corrected by the inspection exit meeting, this was more a result of direct intervention from the NRC inspectors than through initiatives by CECO. On this basis, we have concluded that this example of the violation remains valid.

With regard to Violation 1b, we do not agree with your statement that seismic anchor movements need not be considered during seismic interaction walkdowns.

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The seismic anchor displacements that are pertinent to this discussion do not come from the structure, as you suggest, but from the piping to which the snubber reduction piping is attached or "anchored." This anchor movement is the inertial movement of the piping attachment point that is considered the boundary for the seismic analysis model. This movement must be considered since it is the only way to recouple two different piping analyses that were separated for analytical reasons.

While it may be true that most of the piping has insignificant seismic anchor displacement, the fact is that certain snubber reduction piping systems were "anchored" to piping that was judged to have significant seismic movements. The procedure as reviewed during May 1987, did not consider these inertial movements from the attached piping. On this basis, we have concluded that this example of the violation remains valid.

With regard to Violation 2a, we agree with your statement that there is no requirement to explicitly address zero period acceleration. However, zero period acceleration is a fundamental engineering principle associated with response spectra analysis and as such can not be ignored. On this basis, we have concluded that this example of the violation remains valid.

With regard to Violation 2c, we do not agree with your position that the 90% stress or insulation criteria were not utilized to resolve interferences. The original version of COM-PI-BYR15, "Resolution of Rattle Point Interference Problems" was being utilized at least until April 1987. As part of this procedure the resolution criteria for seismic interferences utilized the 90% stress and insulation criteria. Although the final version of COM-PI-BRY21 contained an adequate approach to interference resolution, this change in methodology was more a direct result of the NRC inspector's intervention than a result of initiatives by CECO. On this basis, we have concluded that this example of the violation remains valid.

Since we have concluded that the above violations remain valid, we further conclude that both violations should remain classified as Severity Level IV. The minimal safety significance that you have assigned to these violations may possibly be attributed to the substantial inspection effort that was expended by the NRC during the course of the snubber reduction project. Had the inspections not taken place until the latter stages of the project, the significance of these violations may have been increased substantially.

Based on the above discussion, it will be necessary for you to comply with the provisions of 10 CFR 2.201 for violation examples 1a, 1b, 2a and 2c and to submit a written statement describing (1) corrective actions taken and the results achieved; (2) corrective actions to be taken to avoid further violations; and (3) the date when full compliance will be achieved for these portions of the violations.

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We appreciate your cooperation in this matter.

Sincerely,

Original Signed by J. J. Harrison

J. J. Harrison, Chief
Engineering Branch

Enclosure: Ltr dtd 8/21/87

cc w/enclosure:

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