



Commonwealth Edison

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

May 17, 1979

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Byron Station Units 1 and 2
Response to IE Inspection Report
Nos. 50-454/79-06 and 50-455/79-06
NRC Docket Nos. 50-455 and 50-456

Reference (a): April 20, 1979 letter from G. Fiorelli
to Byron Lee, Jr. transmitting IE
Inspection Report Nos. 50-454/79-06
and 50-455/79-06

Dear Mr. Keppler:

An inspection was conducted by Messrs. J. E. Konklin and E. J. Gallagher of your office on April 4-11, 1979 of activities at Byron Station Units 1 and 2. As indicated in Reference (a), during this inspection certain activities appeared to be in noncompliance with NRC requirements. Commonwealth Edison Company's response to the item of noncompliance is contained in Attachment A to this letter.

Please address any questions that you might have on this matter to this office.

Very truly yours,

Cordell Reed
Assistant Vice-President

attachment

22 1979

7907160 273

330 349

INFRACTION (79-02-01)

10 CIR, Appendix B, Criterion XIII, states, in part, that "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment.... to prevent damage or deterioration". Byron Topical Report No. CE-1-A commits Commonwealth Edison to the QA Requirements of WASH 1309, "Guidance on Quality Assurance Requirements during the Construction Phase of Nuclear Power Plants", and through WASH 1309 to the requirements of ANSI N45.2.2.

ANSI N45.2.2, Section 6.1.2(4), states, in part, "Items shall be stored on cribbing...." Section 3.5.1 of ANSI N45.2.2 states, in part, "Caps and plugs shall be used.... to protect.... weld end preparations". Section 6.4.2(1) of ANSI N45.2.2 states, in part, "Items in storage shall have all.... closures intact". Section 6.5 of ANSI N45.2.2 states, in part, "Items released from storage.... shall be inspected and cared for in accordance with the requirements of Section 6 of this standard.....".

Contrary to the above, on April 4, 1979, at Level 365 near coordinates M-11 in the Auxiliary Building, the inspector observed twelve containment piping penetration assemblies which were improperly stored. The twelve assemblies were not on dunnage. On the three largest assemblies, the flued head weld prep areas were not protected, and the assemblies were supported on the concrete floor by the edges of the weld prep areas.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

The subject items and storage conditions were brought into compliance on April 6, 1979 with Commonwealth Edison storage criteria, surveillance criteria and procedures for storage and surveillance of items until installation. In addition, Commonwealth Edison has taken action to increase the frequency of surveillance in order to provide for more timely identification and corrective action with regard to such storage conditions.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Commonwealth Edison Company is increasing its delegated contractor's quality control staff and increasing its surveillance activities of items stored throughout the plant.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

June 15, 1979