



Commonwealth Edison

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January 26, 1981

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

Subject: Byron Station Units 1 and 2
Response to IE Inspection Reports
No. 50-454/80-04 and 50-455/80-05

Reference (a): December 30, 1980 letter from J. G. Keppler
to B. Lee

Dear Mr. Keppler:

Reference (a) contained the report of an investigation conducted by Messrs. J. B. McCarten and J. E. Konklin of your office and Mr. L. E. Ellershaw of Region IV regarding activities at Systems Control Corporation and at Byron Station. During that investigation it was determined that certain activities were in noncompliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison Company's response to the Notice of Violation which was appended to Reference (a). The corrective action discussed in Attachment A also addresses your request for discussion of contributing management factors relative to the violation.

Attachment B to this letter contains the requested additional information regarding resolution of the item from Commonwealth Edison Audit No. 6-80-238.

Attachment C to this letter contains the results of the requested inspection of instrument lines.

Please address further questions regarding matters to this office.

Very truly yours,

C. Reed

C. Reed
Vice President

Attachment
00488

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ATTACHMENT A
Response to Notice of Violation

INFRACTION

Criterion XVI of 10 CFR 50, Appendix B, states, in part, that "Measures shall be established to assure that conditions adverse to quality are promptly identified and corrected...and corrective action taken to preclude repetition."

The Commonwealth Edison Company Quality Assurance Manual in Quality Requirement QR No. 16.0, Section 16.1, states, in part, that "A corrective action system will be used to assure that such items as ...defective material and equipment...are promptly identified and corrected...this system will provide follow up to assure that corrective measures are effectively implemented."

Contrary to the above, during the period from May 1977 to February 1980, the licensee failed to take effective and timely actions to assure that deficiencies in the System Control Corporation (SCC) Quality Assurance Program and equipment fabrication activities were corrected, as evidenced by continued receipt and acceptance on site of defective safety-related equipment from SCC.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

During the period in question, May 1977 to February 1980, Systems Control Corporation supplied various components under the scope of the following procurement specifications:

Main Control Boards	- Specification F/L-2788
Local Instrument Panels	- Specification F/L-2809
Cable Pans and Hanger Assemblies	- Specification F/L-2815

Systems Control Corporation in the course of fabricating components assemblies under the scope of each specification has deviated from certain specified technical requirements. In each case of deviation, the items of nonconformance have been identified and documented on a Nonconformance Report (NCR).

Corrective action has been completed for the Local Instrument Panels. Nonconformance Reports F-474 and F-484 covering this were closed on 10/21/80.

For the Main Control Boards, engineering analysis to determine disposition has been initiated under NCR F-544 dated 8/8/80.

For cable pan stiffener problems, NRC F-529 was issued on 7/9/80 and Sargent & Lundy has determined the stiffeners satisfied specification requirements. However, final disposition of this NCR is dependent on a re-survey of equipment in the field which is currently under way.

The waiver of inspection points without QA concurrence resulted from failure to recognize that QA approval of waivers was mandatory. Also, the site receipt inspection performed by the Project Construction Department was primarily an inspection for shipping damage. Subsequently, as identified in the NRC inspection report, detailed inspections were performed by Commonwealth Edison which identified deviations on components supplied by Systems Control. The deficiencies identified have been controlled via NCR's. In addition, the Commonwealth Edison Site Quality Assurance Department has established requirements for performing significantly more detailed inspections for all equipment received on site generally using the independent testing contractor. These inspections are in addition to those performed by Project Construction.

MANAGEMENT FACTORS WHICH LED TO CONTINUED RECEIPT OF NONCONFORMING MATERIAL AND ACTION TAKEN TO PREVENT RECURRENCE

With regard to the management factors contributing to the continued receipt and acceptance of defective equipment shipped by Systems Control, the previously established method of handling notification of inspection points was not sufficiently controlled to assure that all established mandatory inspection points were properly executed or properly waived. As a result, processing the notification of inspection points has been revised to ensure that all notifications are processed through a designated Project Construction coordinator who is responsible for: (1) assigning a Project Construction engineer to conduct the inspection point or, (2) obtaining documented waiver from Quality Assurance for all mandatory inspection points which are not to be conducted. Project Construction and Quality Assurance personnel who are involved in the processing of vendor inspection points have been retrained. In addition, all project specifications for the Byron Site have been reviewed to assure that mandatory inspection points are established.

As described in the preceding corrective actions, receiving inspections will be upgraded to provide significantly more detailed inspections for all safety related equipment.

For Systems Control Corporation, source inspection has been conducted for all safety-related equipment shipped since February 1980 and source inspection will be conducted on all future shipments involving Systems Control. These inspections have been conducted by

the Pittsburgh Testing Laboratory under the direction of the Byron Quality Assurance Department. The inspections cover welding, equipment identification, sealing of instrumentation lines and other specification requirements.

Furthermore, since January 1978 Commonwealth Edison has not made any purchases from Systems Control. As a result of the NRC verification of allegations against Systems Control, as reported to Commonwealth Edison on December 30, 1980, Systems Control has been barred from procurement activity involving safety-related purchases for an indefinite period.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

We are in full compliance at this time.

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NRC Docket Nos. 50-454
50-455

ATTACHMENT B

RESPONSE TO REQUEST FOR STATUS OF
UNRESOLVED ITEM ON Commonwealth Edison AUDIT No. 6-80-238

As of 8/4/80, finding #3 of Commonwealth Edison Audit No. 6-80-238 has been closed. this was based on a comparison of Mr. Pezzullo's education, experience and training to ANSI N45.2.6-1978 recommendations.

ATTACHMENT C

RESULTS OF INSPECTION OF INSTRUMENT
LINES ON LOCAL INSTRUMENT PANELS PROVIDED
BY SYSTEMS CONTROL CORPORATION

Through a combination of direct visual examination on two 12 inch sections of instrument lines removed from two panels of the suspect population, and by examination of flush cloths drawn through the instrument lines of other panels of the suspect population, we have found no evidence of corrosion products contained within the lines in question. Additional samples are being taken. These examinations are being conducted at this time to ascertain if rust particles were introduced into the lines during the course of the manufacturing process. Regardless of the foregoing findings, the lines will be flushed prior to being placed into an operating status.

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