



Commonwealth Edison

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August 12, 1980

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 Report
Nos. 50-454/80-12 and 50-455/80-11
NRC Docket Nos. 50-454 and 50-455

Reference (a) July 10, 1980 letter from G. Fiorelli to
C. Reed

Dear Mr. Keppler:

Reference (a) contained the results of an inspection conducted by Mr. K. R. Naidu, J.F. Schapker, R. L. Lee, D. W. Hayes and C. C. Williams of your office on June 17, 18 and 19, 1980 of activities at Byron Station. During that inspection, certain activities appeared to be in noncompliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison Company's response to the item of noncompliance. Based on the information contained in this response, Commonwealth Edison respectfully requests the NRC Region III to change the infraction to an observation.

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

Very truly yours,

James S. Abel
James S. Abel
Director of
Nuclear Licensing

JSA:WFN:rap

attachment

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ATTACHMENT A
RESPONSE TO NOTICE OF VIOLATION

The item of apparent noncompliance identified in Appendix A of the NRC letter dated July 9, 1980 is responded to in the following paragraphs.

Item Infraction

10 CFR 50, Appendix B, Criterion III, states, in part, that "Measures shall be established to assure that applicable ... design basis ... for those structures, systems, and components...are correctly translated into specifications, drawings, procedures, and instructions."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 9, dated July 16, 1979, states in Paragraph 3.1 that "The fundamental vehicle for design control involves multi-level review and/or evaluation of design documents by individuals or groups other than the original designer or designer's immediate supervisor whose authority and responsibility are identified and controlled by written procedures. The design documents include, but are not limited to, design and construction specifications, equipment specifications and process drawings. Review of and evaluation by the Architect Engineer will assure that designs and materials will conform to the ASME Code and other applicable codes, standards, regulatory requirements, SAR commitments, and appropriate quality standards as applicable.

10 CFR 50, Appendix A, Criterion IV, states "Structures, systems, and components important to safety shall be designed to accommodate the effects of and be compatible with environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, and loss-of-coolant accidents. These structures systems, and components shall be appropriately protected against dynamic effects, including the effects of missiles, pipe whipping, and discharging fluids that may result of equipment failures and from events and conditions outside the nuclear power plant."

10 CFR 50, Appendix A, Criterion V, states "Structures, systems and components important to safety shall not be shared among nuclear power units unless it can be shown that such sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, an orderly shutdown and cooldown of the remaining units."

Contrary to the above, it was determined that CECO. did not ensure that Sargent and Lundy adequately translated the requirements in 10 CFR 50, Appendix A, Criterion IV and V, in the design of the cooling water supply to the Emergency Diesel Generator 1A in the following instances:

1. A common header is installed in the room housing Emergency Diesel Generator 1B to supply the cooling water to Diesel Generators 1A and 1B.
2. The "to" and "return" cooling waterlines to Diesel Generator 1A pass through the room housing Unit 1B. In the event of an accident in Unit 1B emergency diesel generator room, both Emergency Diesel Generators 1A and 1B could become inoperable due to loss of cooling water.

Response:

With regard to Item 1, the inspector's observation is not correct as there is no such common header.

With regard to Item 2, in actuality the 1A and 1B rooms in this observation are reversed, i.e. the 1B "to" and "return" lines pass through the 1A room. Regardless, Commonwealth Edison has reviewed the present design and concludes that it is adequate to satisfy the intent of Criterion IV and V of 10 CFR 50, Appendix A. The basis for this conclusion as well as the basis for the design follows:

1. All valving including the cross connects are located outside the diesel generator rooms;
2. The 1B room is located on an outside building wall and cannot be entered piping wise from the south;
3. Since the turbine building is Category II, piping cannot enter the room from the east;
4. No entrance is possible from the west, and entering from above or below would result in a similar pipe routing through the 1A switchgear room and 1A diesel oil storage room, respectively;
5. The 1A and 1B piping is separated immediately upon entering the 1A room;
6. No missiles are postulated from the emergency diesel generators;
7. Essential service water piping is moderate energy; and

8. The cooling water lines in question are all of the same size and wall thickness and, therefore, any break in one line would not cause a break in another line.

Based on the information presented, Commonwealth Edison respectfully requests the NRC Region III to change the apparent infraction to an observation. In addition, Commonwealth Edison believes that the type of concern expressed in this inspection report, i.e. site inspections which review the adequacy of the design with respect to 10 CFR 50, are more appropriately addressed to the Office of Nuclear Reactor Regulation (NRR), rather than issued as non-compliance items to the Applicant. Then, NRR can consider the item as a design deficiency during their detailed review of the Byron and Braidwood Final Safety Analysis Report.