



Commonwealth Edison
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April 29, 1982

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

Subject: Byron Station Unit 1
I&E Inspection Report No.
50-454/82-02

Reference (a): March 30, 1982, letter from
C. E. Norelius to Cordell Reed.

(b): October 2, 1981, letter from
L. O. DelGeorge to J. G. Keppler

Dear Mr. Keppler:

Reference (a) provided the results of an inspection conducted by Mr. M. A. Ring during January and February of activities at Byron Generating Station. During that inspection it was determined that certain activities were not in compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation which was appended to reference (a).

Special attention has been given to the corrective action being taken to protect installed equipment. Reference (b) described corrective action taken as a result of a similar violation at Byron regarding instrument racks. In that instance, the corrective action included a monthly housekeeping inspection of safety-related panels by the instrument installation contractor. The corrective action being taken this time is considerably broader. As indicated in the attachment, we have now instructed all contractor employees in the importance of equipment care and preservation. Instructive signs have been posted and a periodic inspection tour by operating personnel has been instituted. We are confident that these actions will minimize the occurrence of conditions potentially damaging to installed plant equipment.

To the best of my knowledge and belief the statements contained herein and in Attachment A are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees and contractors. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

J. G. Keppler

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If you have any questions concerning this matter, please contact this office.

Very truly yours,

Wayne L. Stiede

Wayne L. Stiede
Assistant Vice-President

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SUBSCRIBED and SWORN to
before me this 29th day
of April, 1982

Rosalie A. Pienta
Notary Public

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ATTACHMENT A

Response to Notice of Violation

Violation 1

10 CFR 50, Appendix B, Criterion XIV requires that measures be established to indicate by the use of markings such as stamps, tags, labels, routing cards or other suitable means, the status of inspections and tests performed upon the individual items of the nuclear power plant. Measures shall also be established for indicating the operating status of structures, systems and components of the nuclear power plant.

The Byron Station Startup Manual states in Paragraph 4.1 that the System Status Notice is a system of tracking the system status during the completion of construction, flushing and testing, until turnover for normal unit operation. The System Status Notice consists of: . . . the type of marking (or taping) required. In Paragraph 4.1.2, Re-entry Control, the Startup Manual states that re-entry control consists of: . . . blue or yellow tape on all system components, except piping, indicating the portion of the system under re-entry control.

Contrary to the above:

- a. Six components (instruments) in the RHR system and one component in the SI system were observed which had not been blue taped to indicate release for preoperational testing as shown on the System Status Notice.
- b. A second system of taping which involved blue tape (and other colors) of almost identical color was identified as being used at the site to aid in establishing separation for safety-related instrumentation. This taping system meant nothing as far as the system status notice was concerned, yet further confused the determination of the status of any particular instrument.

Corrective Action Taken and Results Achieved

- a) The six RHR system instruments were blue taped on January 26, 1982, at the time of the inspector's observation. The SI system instrument was blue taped on January 27, 1982.
- b) To avoid confusion between taping systems, special blue and yellow tape for use in the System Status Notice will be used. This tape bears the labels "PREOP" on the blue tape and "OPERATING" on the yellow tape. A retaping program to convert to the labeled tape is in progress with priority being given to systems being tested or flushed.

Corrective Action to Prevent Further Noncompliance

- a) Detailed instructions from the Operating Department have been distributed for the proper and uniform initiation or change of a System Status Notice. The new instructions include an initiation checklist with two entries pertaining to taping, a list of specific components to be taped, and the use of P&ID drawings by the individual applying the tape.
- b) The Startup Group will authorize the new use of all taping systems on the project after reviewing the proposed system for conflicts with existing systems.

Date When Full Compliance Will Be Achieved

- a) April 22, 1982.
- b) All systems in Test or Flush will be retaped by June 1, 1982.

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Violation 2

10 CFR 50, 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.

The Commonwealth Edison Company Quality Assurance program contains, in Quality Requirement Q.R. 2.0 a commitment to the regulatory position of Regulatory Guide 1.38, Revision 2, which endorses the requirements of ANSI N45.2.2-1972. Section 6.5 of ANSI N45.2.2 states, in part, that "Items released from storage and placed in their final locations within the power plant shall be . . . cared for in accordance with the requirements of Section 6 of this Standard." Section 6 of ANSI N45.2.2 states, in part, that "(6.1.1) Levels and methods of storage necessary are defined to minimize the possibility of damage or lowering quality due to corrosion, contamination, deterioration, or physical damage. (6.2.2) Cleanliness and good housekeeping practices shall be enforced at all times in the storage areas. (6.2.4) The use or storage of food, drinks . . . in controlled storage areas shall not be permitted. (6.4.2) Items . . . shall have all covers, caps, plugs, or other closures intact . . . covers removed for internal access at any time for any reason shall be immediately replaced and resealed after completion of the purpose for removal."

Contrary to the above, the licensee does not have an adequate program to ensure proper care and preservation of safety related equipment as evidenced by approximately 15 instances of conditions potentially damaging to safety-related equipment identified while observing the performance of RHR and DG tests on January 26, February 3 and 18, 1982.

This is a repetitive item of noncompliance in that similar problems were identified in NRC Inspection Report No. 50-454/81-12-01, dated September 2, 1981, and subsequent followup Inspection Reports No. 50-454/81-18 and 50-454/81-14, dated November 17, 1981. Also Inspection Reports No. 50-454/82-03 and 50-455/82-02 indicated that progress in this area was insufficient to close the item.

Corrective Action Taken and Results Achieved

Action was taken to clean up all 15 instances found during the RHR and DG Test. All items were found undamaged or replacements ordered as of February 25, 1982.

Corrective Action Taken to Avoid Further Noncompliance

Project Construction Department issued to all contractors criteria to be followed for equipment care and preservation. Required training of all contractor personnel was performed and documented as of March 19, 1982.

Violation 2
(Continued)

Signs summarizing the actions required for equipment protection have been posted in the general areas. The Operating Department has divided the facility into housekeeping areas and assigned management individuals areas of responsibility. Housekeeping/equipment protection inspection tours are conducted with written reports being submitted to a Housekeeping Sub-Committee for evaluation and resolution.

Date When Full Compliance Will Be Achieved

April 22, 1982.

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