



Commonwealth Edison

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

February 9, 1983

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 Units 1 and 2
I&E Inspection Report Nos.
50-454/82-24 and 50-455/82-18

Reference (a): January 3, 1983, letter from
R. L. Spessard to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection conducted by Mr. J. M. Hinds of your office on November 30 through December 9, 1982 of activities at Braidwood Station. During this inspection it was apparent 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 appended to reference (a).

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

Please address further questions regarding this matter to this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

TRT/lm

Attachment

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ATTACHMENT A

Response to Notice of Violation

10 CFR 50, Appendix B, Criterion XIII, Handling, Storage and Shipping states in part that, "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

The Byron FSAR, Chapter 17.0, Quality Assurance, states in part: "Therefore the Commonwealth Edison Topical Report CE-1-A, Revision 7 and all subsequent revisions unless otherwise noted in this chapter, is the basis for the QA program at Byron/Braidwood Station."

The Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 22 dated November 1, 1982, Section 13, "Handling, Storage and Shipping," states "Written instructions for handling, preservation, storage and shipping will be used to specify protective conditions necessary to prevent damage or deterioration of materials and equipment."

The Commonwealth Edison Company Quality Assurance Program Topical Report CE-1-A, 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.

The Byron/Braidwood FSAR; Appendix A - Application of NRC Regulatory Guides, Regulatory Guide 1.38, Revision 2, Section A1.38-1, Amendment 37, March 1982, states in part, "The applicant complies with this regulatory guide. Packaging shipping, receiving, storage and handling of PWR power plant equipment are covered by quality specifications based on ANSI N45.2.2-1972."

Violation 1a:

ANSI N45.2.2-1972, Section 6.1.2, Levels of Storage, Sub-section (1) states in part, "Level A items shall be stored under special conditions similar to those described for Level B items, but with additional requirements such as temperature and humidity control within specified limits...."

Contrary to the above, the licensee does not have an adequate program to ensure proper monitoring and control of temperature and humidity of storage facilities as evidenced by the lack of temperature monitoring and control systems in the CECo site storage warehouse assigned to Hatfield Electrical Company (HECo) housing Level B safety related electrical equipment and the lack of temperature and humidity monitoring and control systems in the CECo site storage warehouse assigned to Hunter Corporation (Hunter) housing Level A and B safety related mechanical equipment as of December 3, 1982.

Response 1a:

Corrective Action Taken and Results Achieved

Temperature monitoring devices have been ordered and will be placed in the warehouses to verify the proper temperature band is maintained by the heating/ventilation systems currently installed. Commonwealth Edison uses manufacturers storage criteria which classify all NSSS equipment found in the Hunter warehouse as Level B, C or D. It is the intent of Commonwealth Edison to maintain these warehouses as ANSI N45.2.2 Level B storage. Humidity monitoring and control is therefore not required.

Corrective Action Taken to Prevent Further Noncompliance

Commonwealth Edison has developed and approved for use a new instruction "BSI 27, Storage Requirements and Surveillance Plan, dated 12-30-82" which will on a scheduled basis verify proper ambient temperature in storage warehouses.

Date When Full Compliance Will Be Achieved

March 1, 1983.

Violation 1b:

ANSI N45.2.2-1972, Section 6.2.2., Cleanliness and Housekeeping Practices, states in part, "The storage areas shall be cleaned as required to avoid the accumulation of trash, discarded packing materials and other detrimental soil."

Contrary to the above, the licensee has not established adequate controls to maintain the required storage area cleanliness levels as evidenced by the accumulation of styrofoam type packing materials, plastic packing bags, soft drink cans, scrap material and other assorted debris observed in, on, and under warehouse storage racks in the CECO site storage warehouse assigned to Hunter housing Level A and B safety related mechanical equipment.

Response 1b:

Corrective Action Taken and Results Achieved

The debris in warehouse #3 was removed.

Corrective Action Taken to Prevent Further Noncompliance

The importance of a clean warehouse was re-emphasized to the Hunter warehouseman and cleaning crews will be used more often if necessary in the future. Scheduled surveillances according to "Site Instruction BSI 27, Storage Requirements and Surveillance Plan, dated 12-30-82" will verify cleanliness of storage areas.

Date When Full Compliance Will Be Achieved

February 1, 1983.

Violation 1c:

ANSI N45.2.2-1972, Section 6.2, Storage Areas, states in part, "Periodic inspections shall be performed to assure that storage areas are being maintained in accordance with these requirements."

Section 6.3.1, Ready Access to Stored Items, states that, "All items shall be stored in such a manner as to permit ready access for inspection or maintenance without excessive handling, to minimize risk of damage."

Contrary to the above, the licensee has failed to implement a plan or procedure to assure access to stored items for required inspections as evidenced by the methods of stacking and storing of safety related mechanical equipment observed in the CECo site storage warehouse assigned to Hunter.

Response to 1c:

Corrective Action Taken and Results Achieved

The storage layout in warehouse #3 was reorganized to facilitate easy access to stored items.

Corrective Action Taken to Prevent Further Noncompliance

Contractor warehousemen have been made aware of the importance of ready access of stored materials. Scheduled surveillances according to "Site Instruction BSI 27, Storage Requirements and Surveillance Plan, dated 12-30-82" will verify ready access to stored materials.

Date When Full Compliance Will Be Achieved

February 1, 1983.

Violation 1d:

ANSI N45.2.2-1972, Section 6.3.3, Storage of Hazardous Material, states that, "Hazardous chemicals, paints, solvents, and other materials of a like nature shall be stored in well ventilated areas which are not in close proximity to important nuclear plant items."

Contrary to the above, the licensee has not demonstrated an effective system of controls to prevent improper storage of hazardous materials as evidenced by the stacking and storing of 5-gallon cans of paint in, among, and under important nuclear plant items observed in the CECo site storage warehouse assigned to Hunter.

Response 1d:

Corrective Action Taken and Results Achieved

The 5-gallon cans of paint were removed from proximity to important nuclear plant items.

Corrective Action Taken To Prevent Further Noncompliance

The requirement to segregate hazardous materials (including paint) from important nuclear power plant items has been explained to the appropriate contractor warehouseman. Scheduled surveillances according to "Site Instruction BSI 27, Storage Requirements and Surveillance Plan, dated 12/30/82" will verify that hazardous materials are properly segregated in storage.

Date When Full Compliance Will Be Achieved
February 1, 1983.