



Commonwealth Edison
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Address Reply to: Post Office Box 767
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February 10, 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.
50-454/82-18 and 50-455/82-13

Reference (a): January 11, 1983 letter from
C. E. Norelius to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection conducted by Mr. R. N. Sutphin during April, May, and December, 1982 of activities conducted at Byron Station. During this inspection certain activities were found to be in noncompliance 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

Violation

10 CFR 50, Appendix B, Criterion III states in part that, "Measures shall be established to assure that applicable regulatory requirements...are correctly translated into specifications, drawings, procedures, and instructions."

The CEC's Topical Report, CE-1-A, Revision 15, Section 3.1 states in part that, "Review and evaluation by Architect Engineer, the Nuclear Steam Supply System vendor, and/or Project Engineering or the Station Nuclear Engineering Department will assure that designs and materials will conform to the ASME and other applicable codes, standards, regulatory requirements, SAR commitments, and appropriate quality standards, as applicable."

Contrary to the above, the following examples were identified in which the licensee failed to correctly translate the applicable regulatory requirements into the specifications, drawings, procedures, and instructions:

- (a) The referenced edition dates for four civil/structural standards were inconsistent between FSAR Table 3.8-2 and S&L Specification F-2722.
- (b) Five standards referenced in the FSAR Table 3.8-2 were not implemented for civil/structural work performed at Byron.
- (c) Neither S&L Specification F-2722 nor Specification F-2850 included the FSAR Table B.1-5 requirement to test the first batch of concrete placed each day. The FSAR statement was not implemented, in that, three of six concrete pour packages which were reviewed indicated that the first batch had not been tested.

Corrective Action Taken and Results Achieved

The FSAR is being revised as follows:

- (a) The only dates to be retained in FSAR Table 3.8-2 will be for the codes used in the design of safety related structures. All other standards delineated in this table are for recommended practices in concrete construction and material specifications that do not affect the design of safety related structures.
- (b) Five standards referenced in the FSAR Table 3.8-2 that were not implemented for civil/structural work performed at Byron will be deleted from the Table.

- (c) Testing the first batch is intended to control overnight variations in the moisture content of aggregate and variations in the concrete materials. Since the batch plant bins and silos store material overnight, the materials used in the first pour are the same materials already in the batch plant from the preceeding production day. Segregation, contamination, degradation in properties or moisture variations in the aggregate are therefore reduced to a minimum. Therefore, testing of the first batch of concrete will not be of any additional significance in controlling the quality of concrete.

Experience has shown that variations in slump, air content and temperature occur several batches after production is started every day. These variations are related to material transition from the material stored in the batch plant to material that is stock piled.

Corrective Action Taken to Avoid Further Noncompliance

The Byron/Braidwood FSAR will be reviewed for other conflicts with structural design drawings and specifications. Any necessary FSAR revision will be submitted to the NRC for review.

Date When Full Compliance Will Be Achieved

April 1, 1983.