



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 29, 1991

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Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
799 Roosevelt Road-RIII
Glen Ellyn, IL 60137

Subject: Byron Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-454/91007; 50-455/91007
NRC Docket Nos. 50-454/91007 and 50-455/91007

Dear Mr. Davis:

Enclosed is Commonwealth Edison Company's (CECo) response to the subject Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited one Level IV violation regarding three examples of failing to follow administrative procedures.

CECo understands the significance of the events, the need for effective corrective actions to prevent recurrence and has considered these in developing actions in response to the cited violation.

If your staff has any questions or comments concerning this letter, please refer them to Perry Barnes, Compliance Supervisor at (708) 515-7278.

Very truly yours,

T.J. Kovach
Nuclear Licensing Manager

Enclosure

cc: A.H. Hsia-NRR
W.J. Kropp-Byron
Document Control Desk-NRR

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ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-454/91007 and 50-455/91007

VIOLATION

10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison's Quality Requirement 5.0, states that activities affecting quality shall be prescribed by documented instructions and procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions and procedures.

BAP 100-7, Revision 4, "Overtime Guidelines for Personnel That Perform Safety Related Functions," paragraph C5.b states that the following overtime guidelines shall be followed: b. An individual should not be permitted to work...more than 72 hours in any 7 day period. Paragraph C6. and C8. further state that deviations shall be approved by the Station Manager or his designee in accordance with BAP 100-7T1, "Overtime Deviation Authorization," and after the fact, approvals should be obtained by the following normal work day or as soon as practical and insure BAP 100-7T1 is completed through Step 6 (Department Head Approval).

- a. Contrary to the above, a Fuel Handling Foreman performing duties as a Senior Reactor Operator Limited (SROL) exceeded the 72 hour guidelines by 10 hours the week of September 20-26, 1990, without authorization documented on BAP 100-7T1 "Overtime Deviation Authorization."

BAP 330-5, Revision 4, "Lock and Key Control," paragraph C.4 states that a Key Control Log shall be maintained in the Shift Engineer's office. Any entry will be made in the log whenever a key from the key control cabinet in the Shift Engineer's office is checked out. Upon return of the Key, the date and time returned will be completed.

- b. Contrary to the above, on February 6, 1991, key #451 for the Unit 2 Train A Safeguards Test Cabinet panel was found in the door without an entry in the key control log authorizing the key for checkout. Also, key #489/160 was found in the key control cabinet, without an entry in the key control log for the return of the key.

BAP 1100-3, Revision 8, "Fire Protection Systems, Fire Rated Assemblies, Radiation, Ventilation and Flood Seal Impairments," Paragraph F.1.c, required that a Fire Protection Impairment Permit (FPIP) to be initiated by the Supervisor in charge of the work.

- c. Contrary to the above, on January 21, 1991, a FPIP was not initiated for repairs to the 2B Emergency Diesel Generator door. As a result, when the door was removed for the repairs the licensee failed to either post a continuous fire watch or verify operability of fire detectors on at least one side of the door within one hour.

This is a Severity Level IV violation (Supplement 1). (50-454/1007-01 (DRP)); 50-455/91007-01(DRP)).

ATTACHMENT (continued)

RESPONSE

Commonwealth Edison acknowledges the violation stated above.

General Corrective Actions Taken to Avoid Further Violation

Byron Station will conduct a review of relevant performance indicators including Deviation Reports, Licensee Event Reports and Notices of Violation to determine whether a trend in procedural adherence can be identified. The results of this review will be communicated to Station staff and appropriate action taken as necessary. This review and subsequent action is expected to be completed by August 30, 1991.

- A. BAP 100-7, Revision 4, "Overtime Guidelines for Personnel That Perform Safety Related Functions:

Corrective Actions Taken and Results Achieved

A memo was issued to all personnel on November 21, 1990, stating..... In the interim period, all departments are expected to comply with the current BAP 100-7 guidelines regardless whether or not the activities being performed are safety-related.....

Corrective Actions Taken to Avoid Further Violation

On April 22, 1991, the Production Superintendent held a meeting with schedulers/timekeepers from all departments. The requirements of Generic Letter 82-12 and BAP 100-7 were reviewed. Adherence to BAP 100-7 was reemphasized. Additionally, "before the fact" authorization with appropriate signatures is required prior to exceeding Generic Letter 82-12 overtime guidelines.

The Corporate Directive, NOD OA.13, Overtime Guidelines, is currently in revision. On April 26, 1991 a Station Overtime Policy was issued by the Byron Station Manager which clarifies the requirements of Generic Letter 82-12. The Station Overtime Policy will be followed until NOD OA.13, Rev. 2, is issued for use. At that time the Station Overtime Policy will be reviewed to ensure compliance.

Date When Full Compliance Achieved

Full compliance has been achieved.

- B. BAP 330-5, Revision 4, "Lock and Key Control":

Corrective Action Taken and Results Achieved

Upon notification the Shift Engineer immediately dispatched an operator to correct the identified deficiencies. The Auxiliary A Safeguards Test Cabinet panel (2PA11J) was inspected and then properly locked. The other cabinets located in the Auxiliary Electric room were also verified to be properly locked.

ATTACHMENT (continued)

Corrective Actions Taken to Avoid Further Violation

Tailgate Memo #39 was issued to the Shift Engineers instructing them to discuss the requirements of proper key control with their shift. These discussions were completed on April 22, 1991.

In addition to the Weekly Key Audit, OBOS XKK-W1, the Operating Engineers will review the key control logs monthly for six months, beginning April 29, 1991, to heighten awareness of the key log program.

Date When Full Compliance Achieved

Full compliance has been achieved.

- C. BAP 1100-3 Revision 8, "Fire Protection Systems, Fire Rated Assemblies, Radiation, Ventilation and Flood Seal Impairments":

Corrective Actions Taken to Avoid Further Violation

The Fire Marshal conducted training sessions from February 4, 1991 to March 15, 1991 with Fire Watch inspectors, Site Engineering and Construction, Pope supervisors and Maintenance personnel to review the requirements and the use of the fire protection impairment permits as required by BAP 1100-3.

Date When Full Compliance Achieved

Full compliance has been achieved