



Commonwealth Edison

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

April 19, 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
30 Day Response to I.E.
Inspection Report Nos.
50-454/83-07 and 50-455/83-03
NRC Docket Nos. 50-454 and 50-455

Reference (a): C. E. Norelius letter to Cordell
Reed dated March 24, 1983.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection conducted by Mr. J. M. Hinds, Jr. of your office during the periods of February 8 through 10 and February 15 through 17, 1983 of activities at Byron Station. During that inspection, certain activities appeared to be in noncompliance with NRC requirements. The Attachment to this letter provided the Commonwealth Edison Company response to the Notice of Violation as appended to Reference (a).

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

Please address any questions that you or your staff may have concerning this matter to this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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EDS/lm

Attachment

cc: Region III Inspector - Byron

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ATTACHMENT

Response to Notice of Violation

Violation

As a result of the inspection conducted on February 8-10, 15-17, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified:

10 CFR 50, Appendix B, Criterion II - Quality Assurance Program states, in part, "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

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 Q.A. 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 2, "Quality Assurance Program," states in part, "Qualification and certifications will be maintained in a current status and will be established to meet the applicable requirements of ASME Code and ANSI Standard N45.2.6" Section 2 further states, in part, "Contractor personnel engaged in inspection, examination and testing activities will be required to be trained, qualified, and certified to perform their specific activity in accordance with the above requirements."

The Commonwealth Edison Company Quality Assurance Program Topical Report CE-1-A, contains in Quality Requirement (Q.R.) 2.0, Section 2.2.III, a commitment to the regulatory position of Regulatory Guide 1.58, Revision 1 which endorses the requirements of ANSI N45.2.6-1978.

The Byron/Braidwood FSAR, Appendix A - Application of NRC Regulatory Guides, Regulatory Guide 1.58, Revision 1, Section A1.58-1, Amendment 33, October 1981, states in part, "The applicant complies with the positions of this Regulatory Guide with the following exception:" (The exception is to the requirement for candidates to have earned a high school diploma or GED only).

Regulatory Guide 1.58, Revision 1, September 1980, Section C, Regulatory Position, Subsection 6 states in part, "Since only one set of recommendations is provided for the education and experience of personnel, a commitment to comply with the regulatory positions of this guide in lieu of providing an alternate to the recommendations of the standard means that the specified education and experience recommendations of the standard will be followed."

ANSI N45.2.6, Section 3.5, Education and Experience - Recommendations, states in part, "The following is the recommended personnel education and experience for each level." Subsection 3.5.2 Level II, states in part, "(1) One year of satisfactory performance as Level I in the corresponding inspection, examination or test category or class, or; (2) High school graduation plus three years of related experience in equivalent inspection, examination, or testing activities, or".

Contrary to the above, it was determined that the Hatfield Electric Company was utilizing a Level II Quality Control Inspector to perform safety related inspection functions who did not meet the minimum related equivalent inspection experience requirements. Details of this apparent noncompliance are identified in Paragraph 5.b(3) of the attached report.

Response

Corrective Action Taken and Results Achieved

Hatfield Electric Co. Quality Control Visual Weld Inspector, T. Wells, certification was rescinded on February 18, 1983. The initial date of his certification to Level II Visual Weld inspection was established and the first 30 days of his work was reinspected. As documented in Hatfield Electric Co. QA/QC Memorandum #760, April 8, 1983, reinspection results show of a total of 1077 welds reinspected, 1067 were found to be properly inspected, 10 were found to be rejectable. In conclusion, T. Wells initial performance as a Level II Weld Inspector provided a 99% acceptable performance level and hence, was qualified to perform Visual Weld inspections.

After completing a review of all On-Site contractor QA/QC qualification procedures with the On-Site contractor QA/QC Managers regarding implementation of CECO Project Construction Department June 9, 1982 letter to contractors, further clarification was generated and issued on March 17, 1983. Each contractor was directed by this letter to: (1) Revise their QA/QC Qualification procedure where required, and (2) then recertify existing QA/QC personnel where necessary.

Corrective Action Taken To Prevent Recurrence

Implement new On-Site contractor QA/QC qualification procedures.

Date When Full Compliance Will Be Achieved

May 15, 1983.