



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

June 13, 1991

U.S. Nuclear Regulatory Commission  
Attn: NRR Document control Desk  
Washington, DC 20555

Subject: Byron Station Units 1 and 2  
Response to Notice of Violation  
Inspection Report Nos. 50-454/91008 50-455/91008  
NRC Docket Nos. 50-454 and 50-455

Reference: (a) W. Shafer Letter to Cordell Reed  
dated May 14, 1991

Reference (a) provided the results of an inspection conducted by Mr. W.J. Kropp, et. al., from March 23 through May 6, 1991 at Byron Station. The inspection identified a violation related to corrective actions for a missed surveillance. The attachment provides our response to the Notice of Violation. We understand the significance of this event as well as the need for effective corrective actions to prevent recurrence. These have been considered in developing actions to address the violation.

If there are any questions or comments regarding this response, please refer them to Perry Barnes, Compliance Supervisor at (708) 515-7278.

Respectfully,

T.J. Kovach  
Nuclear Licensing Manager

Attachment

cc: A.B. Davis, NRC RIII Administrator  
W.J. Klopp, NRC Senior Resident Inspector, Byron

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## ATTACHMENT

### COMMONWEALTH EDISON COMPANY RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT NO. 455/91008

#### VIOLATION (455/91008-01)

10CFR 50, Appendix B, Criterion XVI, as implemented by Commonwealth Edison's Quality Requirement 16.0, states that measures shall be established to assure that conditions adverse to quality, such as deficiencies and deviations, are promptly identified and corrected and that these measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, corrective action taken in response to Licensee Event Report 90-001 involving failure to perform non-routine conditional requirements required by Technical Specifications, did not prevent the failure to perform a non-routine surveillance on the Unit 2 containment emergency hatch. Technical Specification 4.6.1.3.a requires leak rate testing of the containment emergency hatch seals within 72 hours following closure of the hatch. On November 11, 1990, the containment emergency hatch was closed; however, the leak rate surveillance on the containment emergency hatch seals was not performed until March 5, 1991.

This is a Severity Level IV violation (Supplement I). (50-455/91008-01(DRP))

#### REASON FOR THE VIOLATION:

The plant was in mode 5 during a refueling outage. Procedure, 2BOS 6.1.3.c-1, "Primary Containment Equipment/Emergency Hatch Personnel Airlock Door Operability Test", was performed twice while in mode 5. This procedure required opening of the Containment Emergency Hatch (CEH). Procedure, 2BVS 6.1.3.a-2, "Primary Containment Type B Local Leak Rate Tests of the Emergency Personnel Airlock Door Gasket Interspaces", is required to be performed any time the CEH is opened. Surveillance 2BVS 6.1.3.a-2, was performed after the first CEH opening but not after the second. Procedure, 2BOS 6.1.3.c-1 did not contain the requirement for 2BVS 6.1.3.a-2 performance and the surveillance requirement was inadvertently missed.

Technical Specification 4.6.1.3.a requires that a surveillance be performed (2BVS 6.1.3.a-2) within 72 hours after opening the CEH. A tamper seal is placed on the CEH handwheels when 2BVS 6.1.3.a-2 is successfully completed by Technical Staff personnel. The tamper seal was replaced without the performance of surveillance, 2BVS 6.1.3.a-2.

#### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

A Technical Staff meeting was held on March 12, 1991. The discussion during this meeting included surveillance requirements and the performance of non-routine (conditional) surveillances.

On March 15, 1991 an explanation of airlock testing requirements, and notification requirements associated with the emergency hatch was delivered to all Operating personnel through the Shift Engineer Notes program. This information has been reviewed with Operations personnel to enhance knowledge of required testing.

On April 10, 1991, a sign was posted on the Unit 1 and Unit 2 CEH handwheels to alert personnel that the tamper seal shall be installed by Technical Staff following surveillance procedures in accordance with Technical Specification 4.6.1.3.a. On May 31, 1991, an identical sign was made a part of the actual tamper seal connection to prevent the seal from being incorrectly installed. The signs were placed on Unit 1 and Unit 2 CEH.

Procedure, 1/2BOS 6.1.3.c-1 was combined with 1/2BVS 6.1.3.b-2 "Primary Containment Type B Local Leak Rate Test of Emergency Personnel Airlock", on June 10, 1991, to ensure proper sequence of surveillance requirements. This procedure will also initiate the actual hanging of the tags through 1/2BVS 6.1.3.a-2 and give positive control to the Technical Staff for this activity.

Procedure, 1/2BVS 6.1.3.a-2 was revised on June 10, 1991, to reflect the enhanced tamper seal attachment process.

On June 10, 1991, a memo was issued to shift personnel outlining the revisions made to 1/2BVS 6.1.3.b-2 and 1/2BVS 6.1.3.a-2.

#### CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

A special Task Force was formed on May 3, 1991 to review items relating to this violation and to develop an action plan for corrective actions. The action plan was implemented on May 13, 1991, with an expected completion date of August 1991.

It includes the following:

- a. Issue a questionnaire to On-Site Review participants to determine strengths and weaknesses in the review process. Evaluate the results and provide recommendations.
- b. Provide "Regulatory Awareness Sessions" to Byron Station personnel by discussing the following topics including: responsibilities, consequences, common discrepancies/errors, procedural adherence, missed surveillances, and complacency.
- c. Investigate different types of tamper seal connections.
- d. A Non-Routine Surveillance study will be conducted by the On-Site Nuclear Safety Group.
- e. Each responsible department will conduct a review of their Non-Routine Surveillances.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved on August 31, 1991 with completion of action plan steps.