



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois

Address Reply to Post Office Box 767  
Chicago, Illinois 60690

April 5, 1984

Mr. James G. Keppler  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Byron Generating Station Units 1 and 2  
I&E Inspection Report No. 50-454/83-60

Reference (a): March 6, 1984, letter from R. L.  
Spessard to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the report of an inspection conducted by Mr. R. Mendez at Byron Station on December 12-16, and 29, 1983. During that inspection it was determined 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).

Please direct any questions regarding this matter to this office.

Very truly yours,

D. L. Farrar  
Director of Nuclear Licensing

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Attachment

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## ATTACHMENT A

### Response to Notice of Violation

#### Violation

10 CFR 50, Appendix B, Criterion V, as implemented by CECO Topical Report CE-1-A, Section 5, requires activities affecting quality be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, and drawings.

Contrary to the above, sensing line connections to safety-related instruments 1LT-0529, 1LT-0539, and 1LT-0549 were installed contrary to the requirements of Sargent & Lundy drawing series M-2036, in that the sensing lines were connected to the low pressure side of each instrument instead of the high pressure side of the instruments. This condition has not been identified by the licensee even though two of the instruments had been calibrated.

#### Corrective Action Taken and Results Achieved

The instrument sensing lines for level transmitters 1LT-529, 1LT-539, and 1LT-549 have been reconnected in the corrected orientation.

#### Corrective Action Taken to Avoid Further Noncompliance

Isometric drawings for double-piped safety-related instruments will be revised to show the proper high and low pressure connections. QC inspections of all such instruments will be conducted utilizing the revised isometric drawings to verify correct tubing connections to the instrument. Power Azco Pope (PAP) Procedure FP-21 has been revised to provide for documentation of such inspections on Procedure Form 103, Instrument Attachment Record. All future installations will be performed and inspected as identified above.

#### Date When Full Compliance Will Be Achieved

Level transmitters 1LT-529, 1LT-539 and 1LT-549 were all reworked prior to April 1, 1984. Revised PAP Procedure FP-21 was approved on January 3, 1984. The reinspection of safety-related double-piped instruments currently installed will be completed by PAP by April 30, 1984.