



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767
Chicago, Illinois 60690

April 27, 1984

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

Subject: Byron Generating Station Units 1 and 2
I&E Inspection Report No. 50-454/84-07

References (a): March 13, 1984 letter from J. F.
Streeter to Cordell Reed.

(b): October 18, 1982 letter from L. O.
DelGeorge to J. G. Keppler.

Dear Mr. Keppler:

Reference (a) provided the report of an inspection at Byron Station conducted by Messrs. M. Ring, D. Williams, C. VanDenburgh, and R. Nelson in January and February, 1984. During that inspection it appeared that certain activities were in violation of NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to Violation 1 identified in the Notice of Violation appended to reference (a).

No response to Violation 2 is being provided because the Notice of Violation indicated that our corrective actions have already been found acceptable.

Please address further 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 1

10 CFR 50, Appendix B, Criterion XI, states, in part, "Test results shall be documented and evaluated to assure that test requirements have been satisfied. Commonwealth Edison Company Quality Assurance Manual Quality Procedure QP 11-2, "Development, Performance, Documentation and Evaluation of Preoperational and Startup Tests", requires in paragraph 5.6.1 that the Station Technical Staff review the test evaluation report to determine whether additional testing is required, that all deficiencies are noted, and that the test results are complete and meet the acceptance criteria. In paragraph 5.6.2, QP 11-2 requires Project Engineering to review the results of tests and evaluate, classify, and form a conclusion for apparent safety and operational deficiencies.

The Byron Startup Manual (SUM) in paragraph 4.7.3.7 requires deficient conditions discovered during testing to be recorded as deficiency drafts and be resolved or processed. In paragraph 5.2.2.2 the SUM requires the Test Review Board to review and evaluate the test data for completed tests.

Technical Staff Supervisor Memo (TSSM) dated March 18, 1982, states, "If the test data falls outside the specified range a testing deficiency must be written," and "If the test is being performed or is completed the data will be compared to the ranges during post test review."

Contrary to the above, the results of completed preoperational test CC10.10, "Component Cooling," were evaluated by the Test Engineer, the Test Review Board and Project Engineering without properly evaluating 3 instances where deficient conditions were recorded yet no deficiency was written.

Corrective Action Taken and the Results Achieved

Subsequent to the inspection, deficiencies were written for the three recorded deficient conditions. The two flow rate deficiencies were found acceptable with engineering review. The valve vibration deficiency related to a valve which was chattering because it was not fully seated. The valve was closed and the chattering stopped.

Action Taken to Avoid Further Violations

This test was performed in 1982 and evaluated in early 1983. Since mid-1982, annual retraining on the Startup Manual has been provided to all personnel who are directly involved in the conduct and evaluation of preoperational tests. The requirement for recording discrepant conditions as deficiencies has been reviewed during these retraining sessions. The experience gained during the early stages of preoperational testing has also helped to improve performance in this area.

Other practices have been instituted since 1982 which provide additional assurance that the requirements of the Startup Manual will be met. These include the observer program (March, 1983), the use of Test Review Board checklists (August, 1983), daily meetings of the Tech Staff Supervisor and the Group Leaders (June, 1982), and semi-monthly Tech Staff meetings (June, 1982).

Date When Full Compliance Will Be Achieved

August 30, 1983