



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

April 25, 1984

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

Subject: Byron Generating Station Units 1 and 2
I&E Inspection Report Nos. 50-454/84-09
and 50-455/84-07

Reference (a): March 19, 1984 letter from W. S. Little
to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection report at Byron Station by Mr. R. S. Love on January 23-27, 1984. During that inspection certain activities were found to be not in compliance with NRC regulations. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation which was appended to reference (a).

Please address further questions regarding this matter to this office.

Very truly yours,

D. F. Farrar
Director of Nuclear Licensing

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Attachment A

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ATTACHMENT A

Response to Notice of Violation

Violation

10 CFR 50, Appendix B, Criterion XVI, as implemented by CECO Topical Report CE-1-A, Section 16, requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, the failure of Hatfield Electric Company to provide an adequate response to DR 3382 has resulted in 12 safety-related electrical cables being installed in Byron Station, Unit 1, whose quality is indeterminate in that one or more of these cables was overstressed during the attempted pull-back of cable 1VA709.

Corrective Action Taken and Results Achieved

All thirteen safety-related cables in conduit COA7464 are being replaced. Contractor discrepancy reports for all other cables which were pulled out of conduit have been reviewed to confirm that this was an isolated incident.

Corrective Action Taken to Avoid Further Noncompliance

As described in Section 3.C of the inspection report, the possible overstressing of the twelve safety-related cables was not evaluated because insufficient information was the basis for disposition of Discrepancy Report DR 3382.

Commonwealth Edison has addressed the circumstances and events pertaining to this item of noncompliance in a letter to the contractor dated February 2, 1984. This letter emphasized the need for all personnel to clearly define problems so that when they are evaluated, the proper disposition can be given.

This letter also re-emphasized that cables should never be pulled unless the cable pulling crew and the QC personnel know what the allowable pulling tension is for the cable pull to be performed.

Additionally, when cables are to be pulled out of conduit, the allowable pulling tension should be the lesser of the two following tensions:

1. The calculated maximum pulling tension of the cable (or group of cables) being pulled out; or
2. The calculated maximum pulling tension of the single smallest size cable remaining in the conduit.

By utilizing the lesser of these two tensions, we can reasonably be assured that any cables remaining in the conduit will not be over tensioned.

Date When Full Compliance Will Be Achieved

The cables will be replaced by April 30, 1984. Training sessions were held with cable pulling crews on February 29, 1984 and March 7, 1984.