



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

February 6, 1992

U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Byron Nuclear Power Station Unit 1
Response to Notice of Violation Associated with
Inspection Report 50-454/91027
NRC Docket Number 50-454

Reference: A. Bert Davis letter to Cordell Reed dated
January 7, 1992 transmitting Notice of Violation
(Inspection Report 50-454/91027)

Enclosed is Commonwealth Edison Company's (CECo) response to the subject Notice of Violation (NOV) which was transmitted with the referenced letter. The NOV cited one Severity Level III violation related to inoperable containment spray systems during Mode 4 operation.

Byron Station Management are deeply concerned with the events leading up to the change in operational modes without an operable Containment Spray System. We have reviewed the circumstances surrounding the violation and believe that effective corrective actions have been identified to fully address the root and contributing causes.

If there are any questions or comments regarding this response, please contact Denise Saccomando, Compliance Engineer, at 708/515-7285.

Very truly yours,

T.J. Kovach
Nuclear Licensing Manager

Attachments

cc: A. Bert Davis, Regional Administrator - Region III
A. H. Hsia, Project Manager, NRR
W. J. Kropp, Senior Resident Inspector, Byron
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Response to Notice of Violation
NRC Inspection Report
454/91027

VIOLATION

Technical Specification 3.6.2.1 requires, in part, that two independent containment spray systems be operable in Operational Modes 1, 2, 3, and 4, with each spray system capable of taking suction from the refueling water storage tank (RWST) and transferring suction to the containment sump.

Technical Specification 3.0.4 states, in part, that entry into an operational mode or other specified condition shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the action requirements.

Contrary to the above, at 4:55 p.m., on October 27, 1991, the Byron Station Unit 1 entered Operational Mode 4 and two independent containment spray systems were not operable. Specifically, both trains of the containment spray system were inoperable and not capable of taking suction from the RWST and transferring suction to the containment sump because the control switch for each of the pumps of the containment spray systems was in the pull-to-lock position when Mode 4 was entered.

THE REASON FOR THE VIOLATION

The violation has been attributed to personnel error and ineffective implementation of procedures.

Station personnel had an inadequate awareness of/use of procedures and did not exhibit good communication practices. Additional causes included a lack of procedure clarity and personnel understanding of certain portions of the procedures being used.

THE CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Upon discovery on October 27, 1991, at 11:30 p.m., the Technical Specification Limiting Condition for Operation (LCO) 3.0.3 was entered. At 12:14 a.m., on October 28, 1991, the containment spray system was returned to an operable status and the LCO was exited.

Personnel involved in the event were counselled with respect to management's performance expectations including procedural adherence, communications and documentation of reviews. Appropriate disciplinary action has been taken.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

The Operations Training Group is developing a table top scenario on mode changes for licensed operators. The Lesson Plan will include procedures and activities that must be completed prior to a mode change. The training will be completed by April 3, 1992.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION
(Continued)

The Training Department has evaluated infrequently performed tasks for implementation into the 1992 continuing training programs. Thirteen tasks were selected for licensed operator continuing training and nineteen tasks were selected for non-licensed operator continuing training.

INPO Team Training was started in January 1992. This training, focused on team skills, consists of both classroom and simulator scenarios that utilize the total team concept. All operations shift personnel are scheduled to receive this training. The training is scheduled to be completed by February 21, 1992.

The Byron General Operating Procedures and Flowcharts associated with mode changes are currently being reviewed and revised to prevent recurrence of errors due to procedure clarity. These revisions are expected to be completed by February 20, 1992, prior to the Byron Unit 2 refueling outage (B2R03). Training on these procedure changes will be completed by April 3, 1992, prior to Unit 2 Startup from B2R03.

NOTE: Should conditions arise which require use of mode change procedures prior to completion of the actions, additional management oversight will be provided for mode change activities.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved upon returning the containment spray system to an operable status.