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October 19, 1984

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Ivan W. Smith, Esquire  
Administrative Judge and  
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U.S. Nuclear Regulatory  
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Washington, D. C. 20555

Dr. Richard F. Cole  
Administrative Judge  
Atomic Safety and  
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Washington, D. C. 20555

Dr. A. Dixon Callihan  
Administrative Judge  
Union Carbide Corporation  
P.O. Box Y  
Oak Ridge, Tennessee 37830

Re: In the Matter of Commonwealth Edison Company  
(Byron Nuclear Power Station, Units 1 and 2)  
Docket Nos. 50-454<sup>6</sup> and 50-455<sup>α</sup>

Dear Administrative Judges:

In accordance with the Commission's disclosure requirements, I am enclosing a letter dated August 22, 1984 from Mr. DelGeorge of Commonwealth Edison Company to Mr. Keppler of the NRC. The letter, which was sent at Region III's request, provided information regarding data obtained under the Byron Reinspection Program and reported in the June Supplement to the final report. Specifically, the letter explains the nature and results of the reinspection of two attributes under that Program, namely, equipment setting and equipment modification.

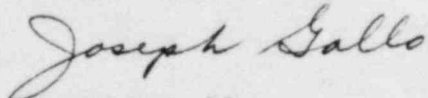
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Mr. French, Partner and Manager of the Electrical Department at Sargent & Lundy, correctly testified that the reinspections for equipment setting and equipment modification were each performed on 50 pieces of safety-related equipment. (French, prepared testimony at 9, 10, ff. Tr. 9044.) However, with respect to equipment modification, Mr. French's prepared testimony refers to inspection of "1850 elements". (French, prepared testimony at 10, ff. Tr. 9044.) Moreover, at the hearing on July 27, 1984, Mr. French was asked by Mr. Lewis, NRC Staff Counsel, if with respect to equipment setting there were "34 individual identified discrepancies" or "34 pieces of equipment out of the 50 which had some discrepancy." (Tr. 9237.) In answering this question, Mr. French stated that it represented "34 items that were inspected in these 50 pieces of equipment." (Tr. 9240.) The Board relied on Mr. French's testimony in its finding 153 in the Supplemental Initial Decision.

Because the potential for confusion exists based on the terminology used by Mr. French, we wish to point out that the explanation of the reinspection procedures contained in the August 22 letter is accurate. The data for equipment setting and equipment modification refer to the number of total "inspections" (each including one or more inspection points) and the number of discrepant "inspections" (each of which contained one or more discrepant inspection points) performed on the 50 pieces of equipment that were inspected. The statements made by Mr. French should be construed accordingly.

Very truly yours,



Joseph Gallo  
One of the Attorneys for  
Commonwealth Edison Company

JG:es

enc.

cc: See Attached Service List



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August 22, 1984

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

Subject: Byron Generating Stations Units 1 and 2  
Byron QC Inspector Reinspection Program  
I&E Inspection Report Nos. 50-454/82-05  
and 50-455/82-04

References (a): L.O. DelGeorge Letter to J.G. Keppler  
dated February 24, 1984

(b): L.O. DelGeorge Letter to J.G. Keppler  
dated July 3, 1984

Dear Mr. Keppler:

This letter provides clarifying information regarding some of the data presented in reference (b) regarding the results of the Byron QC inspector reinspection program. This information is provided at the suggestion of a Region III inspector who has been involved in the detailed review of the June 1984 Supplement to the report on that reinspection program.

Chapter III of the June Supplement summarizes the results of supplemental inspections and evaluations for objective Hatfield inspection attributes. Sections III.B and III.C contain data on reinspections of equipment setting and equipment modification, respectively, which could be misinterpreted.

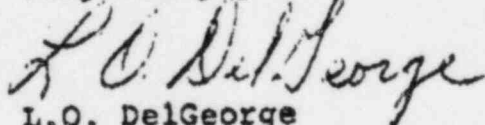
Relative to equipment setting, the report states "A total of 778 items were inspected and 34 discrepancies were identified". The number 778 refers to the number of inspections performed. Each of these inspections may consist of one or more elements. For example, the inspection of an equipment anchoring detail may consist of the objective examination of a welded holddown to assure that each of six welds is present. An entire inspection was termed discrepant if any element of that inspection contained a discrepancy. Using the previous example, if one of the six welds were discrepant, the entire inspection was considered discrepant.

If two welds of the six were discrepant, the entire inspection was still considered as a single discrepancy. The total number of inspection elements was considerably larger than the total number of inspections (778). Similarly, the total number of discrepant elements was greater than the total number of discrepant inspections (34). The results are presented in terms of inspection performed and inspections found discrepant because of the difficulty in counting all of the individual elements. For inspections containing more than one element, the number of discrepant elements was much smaller than the number of inspection elements for each inspection. This representation conservatively represents the quality of the work since the ratio of discrepant elements to elements inspected is smaller than the ratio of discrepant inspections to the number of inspections.

Relative to equipment modification, the report states "A total of 1,850 items covering a considerably larger number of inspection points were inspected and 44 discrepancies were identified". Similar to equipment setting, the number 1,850 refers to the number of inspections that were performed. An inspection of termination locations in a particular section of a panel was considered as one inspection. This inspection may include examination of approximately 250 terminal locations, each of which is considered an inspection point. If any of these inspection points was found to be discrepant, the inspection is considered to be discrepant. The 44 discrepancies stated in the report represent 44 discrepant inspections. The number of discrepant inspection points is larger than the 44 discrepant inspections. However, the number of discrepant inspection points was much smaller than the number of inspection points for each inspection. As with equipment setting, this represents a conservative presentation of the results. The ratio of discrepant inspection points to the total number of inspection points is considerably smaller than the ratio of discrepant inspections to the total number of inspections. As with equipment setting, the results were presented in terms of inspections rather than inspection points because of the difficulty in determining the exact number of inspection points.

Please address further questions regarding this matter to this office.

Very truly yours,

  
L.O. DelGeorge  
Assistant Vice-President

cc: Mr. H.R. Denton  
Mr. R.C. DeYoung