



**Commonwealth Edison**

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July 23, 1984

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

Subject: Byron Generating Station Units 1 and 2  
I&E Inspection Report Nos. 50-454/84-27  
and 50-455/84-19

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

(b): July 10, 1984 letter from D. Farrar  
to J. Keppler.

Dear Mr. Keppler:

This letter provides revised information regarding one of the items of noncompliance identified in I&E Inspection Report Nos. 50-454/84-27 and 50-455/84-19. During the week of July 19, 1984, the data which provided the basis for our reponse to Violation 2 (50-454/84-07-01; 50-455/84-19-01) was reviewed by a Region III Inspector. As a result of this re-review the categorization of certain inspection results has been changed.

The information provided on pages 5 and 6 of Attachment A to reference (b) should be revised as shown below. The changes are underlined.

2. 38 deficiencies were reported for wrong connection detail, wrong weld length, elevation, auxiliary steel plate size, or missing bolts. After review, it was found that 43 deficiencies on 40 hangers were actually recorded. These 43 deficiencies fall into the following classes:
  - a) 9 occur because the drawing revision had not changed a detail which had been previously approved by a Field Change Request or Engineering Change Notice, or were because of drafting errors resulting in inconsistent dimensions;
  - g) 10 were due to member size and in some cases appear to be errors by the first inspector;

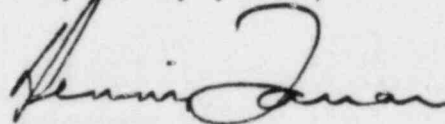
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After review, the data on the use of Memorandum 295 indicates that 12 actual deficiencies existed: 1 was a result of damage, 1 was a result of missing bolts, and 10 were a result of member size. The 4 weld quality deficiencies have not been included in the population assessed to exist as a result of Memorandum 295, due to fact that 295 required that weld inspections with acceptable results were a requisite. With regard to the 12 deficiencies, we do not find that these constitute a failure to assure that nonconforming cable tray hangers were identified and corrected. Rather than failing to assure that nonconforming hangers were identified and corrected, there may have been an error of judgment in using accepted weld traveler records as an alternative means of accepting hanger connection details which were not visible due to fireproofing.

Please address any questions you may have regarding this matter to this office.

Very truly yours,



D. L. Farrar  
Director of Nuclear Licensing

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Attachments

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