



**Commonwealth Edison**

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Dmb

May 24, 1985

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

Subject: Byron Station Unit 2  
IE Inspection Report  
No. 50-455/85-006

Reference (a): April 26, 1985 letter from R. F. Warnick  
to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of inspections by Messrs. Hinds and Connaughton at Byron Station Unit 2 from March 1 through April 15, 1985. During these inspections, certain activities were found to be not in compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison's response to the Notice of Violation appended to reference (a).

Please direct any questions regarding this matter to this office.

Very truly yours,

D. L. Farrar  
Director of Nuclear Licensing

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Attachment

cc: Byron Resident Inspector

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## ATTACHMENT A

### VIOLATION

10 CFR 50, Appendix B, Criterion III, "Design Control", states: "Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in 10 CFR 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions".

Commonwealth Edison Company Quality Procedures 3-1, "Design Control", and 5-1, "Quality Instructions and Procedures", implement the above requirements.

Contrary to the above:

Design documents and work instructions used for establishing Unit 2 ESF battery 211, battery cell-to-battery rack end stringer gap dimensions did not specify acceptance limits for the maximum gap dimensions consistent with those provided by the battery manufacturer and for which the battery system was seismically qualified.

### CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The installation contractor's field engineer placed a copy of the documentation concerning the dimensional requirements for the battery cell-to-battery rack end stringer gaps in the field work instructions as the work was in progress and prior to the initial QC sign-off. He advised the work crew of the gap requirements and observed them while the adjustments were being performed. Upon completion of the work, production signed off the work package including the documentation concerning the minimum and maximum gap requirements. The contractor's QC inspection was performed and an acceptable inspection report is on file.

### CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

All contractor field engineering personnel were advised that special documents and instructions associated with a Rework Request package, especially those which contain instructional requirements for proper completion of the work, should be kept together in the work package so that all personnel involved are cognizant of the scope of work to be performed.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on April 15, 1985 when the installation contractor's field engineer placed a copy of the documentation concerning the dimensional requirements for the battery cell-to-battery rack end stringer gaps in the field work instructions.

All contractor field engineering personnel were advised of the need to keep special work instructions with the work package as of May 17, 1985.

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