

Commonwealth Edison Company
Byron Generating Station
4450 North German Church Road
Byron, IL 61010-9794
Tel 815-234-5441

October 22, 1996



LTR: BYRON 96-0269
FILE: 1.10.0101

U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Byron Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report No. 50-454/96008; 50-455/96008
NRC Docket Numbers 50-454, 50-455

REFERENCE: Geoffrey E. Grant letter to Mr. Graesser dated
September 27, 1996, transmitting NRC Inspection
Report 50-454/96008; 50-455/96008

Enclosed is Commonwealth Edison Company's response to the Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited one (1) Severity Level IV violation requiring a written response. ComEd's response is provided in the attachment.

This letter contains the following commitments:

1. The entire Byron RPT group will be evaluated, by Job Performance Measures, to determine whether or not this may be a Training or Attention to Detail issue, according to RP Policy 28, "Byron RP Dept. Self Assessments."
2. Byron RP will determine if additional positive controls are needed in Low and High level tool storage areas, to prevent future occurrences.
3. RP and Training will track the Job Performance Measures being conducted to determine future Training requirements, if needed.
4. The Byron Contracted RPT program Posting and Labeling Lesson Plans will be updated to include this event.
5. Byron Training Dept. will determine if this event should be included in the Generic Contracted RPT Program taught at PTC and in Contracted Decon Laborer Training.

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6. The following procedures will be added to RP required reading during 4th quarter Continuing Training:


BRP 5010-1, "Radiation Posting and Labeling Requirements"

BAP 720-3, "Control and Release of Materials in the RPA"

7. Byron RP will determine the feasibility of posting all tool and equipment storage cages as Radiation Areas.

If your staff has any questions or comments concerning this letter, please refer them to Don Brindle, Regulatory Assurance Supervisor, at (815)234-5441 ext. 2280.

Respectfully,


K. L. Graesser
Site Vice President
Byron Nuclear Power Station

KLG/DB/rp

Attachment(s)

cc: A. B. Beach, NRC Regional Administrator - RIII
G. F. Dick Jr., Byron Project Manager - NRR
S. D. Burgess, Senior Resident Inspector, Byron
R. D. Lanksbury, Reactor Projects Chief - RIII
F. Niziolek, Division of Engineering - IDNS
D. L. Farrar, Nuclear Regulatory Services Manager, Downers Grove
Safety Review Dept, c/o Document Control Desk, 3rd Floor, Downers Grove
DCD-Licensing, Suite 400, Downers Grove.

ATTACHMENT I

VIOLATION (454/455-96008-01)

10 CFR 20.1902(a) requires that the licensee post each radiation area with a conspicuous sign or signs bearing the radiation symbol and the words "CAUTION, RADIATION AREA."

Contrary to the above, on September 5, 1996, the area outside the high level tool storage area on the 346' elevation of the Auxiliary Building, a radiation area with a radiation dose rate of approximately eight millirem in one hour at 30 cm from the surface that the radiation penetrated was not posted with a sign bearing the radiation symbol and the words "CAUTION, RADIATION AREA."

This is a Severity Level IV violation (Supplement I).

REASON FOR THE VIOLATION

A Contracted Decontamination Laborer moved a barrel and vacuum cleaner out of the high level tool storage area on the 346 elevation in the Auxiliary Building in order to move additional barrels into the area. When he moved them back into the cage he placed them next to the cage boundary, not back to their original location. He was unaware of the Federal Regulations concerning storage of radioactive material.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. Radiation Protection, upon notification of the discrepancy, immediately surveyed the cage, and moved the equipment to a proper position in the cage.
2. A re-creation of the scene was performed to determine exact dose rates and posting requirements.
3. The Contracted RPT group was tailgated on posting and labeling requirements.
4. Byron HPS notified the NRC Inspector of this investigation and the procedural requirements of the High Level tool storage cages.
5. The Byron RP department completed a survey sweep of all tool and equipment storage cages to insure proper postings and labelings.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

1. The entire Byron RPT group will be evaluated, by Job Performance Measures, to determine whether or not this may be a Training or Attention to Detail issue, according to RP Policy 28, "Byron RP Dept. Self Assessments." NTS item 455-200-96-0009-01 will track this action.
2. Byron RP will determine if additional positive controls are needed in Low and High level tool storage areas, to prevent future occurrences. NTS item 455-200-96-0009-02 will track this action.
3. RP and Training will track the Job Performance Measures being conducted to determine future Training requirements, if needed. NTS item 455-200-96-0009-03 will track this action.
4. The Byron Contracted RPT program Posting and Labeling Lesson Plans will be updated to include this event. NTS item 455-200-96-0009-04 will track this action.
5. Byron Training Dept. will determine if this event should be included in the Generic Contracted RPT Program taught at PTC and in Contracted Decon Laborer Training. NTS item 455-200-96-0009-05 will track this action.
6. The following procedures will be added to RP required reading during 4th quarter Continuing Training:

BRP 5010-1, "Radiation Posting and Labeling Requirements"

BAP 720-3, "Control and Release of Materials in the RPA"

NTS item 455-200-96-0009-06 will track this action.
7. Byron RP will determine the feasibility of posting all tool and equipment storage cages as Radiation Areas. NTS item 455-200-96-0009-08 will track this action.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 9/05/96 when material within the cage had been re-positioned and a re-survey of the area conducted to ensure radiation levels were within the posting limits.