



Commonwealth Edison

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DMB

September 18, 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 1
IE Inspection Report
No. 50-454/85-030

Reference (a): August 20, 1985 letter from
R. F. Warnick to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of inspections by Messrs. Hinds, Brochman, Connaughton, and Ms. Malloy from July 2 through August 1, 1985 at Byron Station. During these inspections, certain activities were found to be in violation of 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,

K. A. Ainger

for
D. L. Farrar
Director of Nuclear Licensing

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Attachment

cc: Byron Resident Inspector

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ATTACHMENT A

VIOLATION

Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained for procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A to Regulatory Guide 1.33, Revision 2, February 1978 states, in part: "Instructions for...startup, shutdown and changing modes of operation should be prepared...for the...Emergency Core Cooling System".

Byron Operating Procedures BOP SI-17, "Placing the Refueling Water Storage Tank Heating Pump and Heater in Service" and BOP SI-18, "Removing the Refueling Water Storage Tank Heating Pump and Heater from Service", implement this requirement. BOP SI-18, Paragraph F.1 states: "Stop the RWST Heating Pump (SI03P) if the RWST temperature is greater than 52°F."

Appendix A to Regulatory Guide 1.33, Revision 2, February 1978, requires that administrative procedures for "Bypass of Safety Functions" and "Authorities and Responsibilities for Safe Operation and Shutdown" should be covered by written procedures.

Byron Administrative Procedure, BAP 300-22, "Conduct of Operations", implements this requirement. Paragraph C.2.4.b states: "The following shall be considered mandatory... Interlocks and other safety equipment shall be properly maintained, tested at regular intervals, and kept in-service at all times." Paragraph C.4.3.c mandatorily requires that equipment shall not be operated in a manner to intentionally avoid the proper functioning of its protective equipment.

BOP SI-17, Paragraph F.1 requires that the control switches for the RWST Heating Pump and Heater be verified or placed in AUTO to start the system.

Contrary to the above:

- a. On June 16, 1985, while in Mode 2, the RWST Heating Pump was not secured when RWST temperature was greater than 52°F.
- b. On June 16, 1985, while in Mode 1, the RWST Heating Pump was operated in manual mode with the high temperature trip defeated.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

- (a) The refueling water storage tank (RWST) heating pump was stopped. Cooldown of the RWST was immediately initiated by placing it on recirculation flow through a residual heat removal heat exchanger via a containment spray pump.
- (b) The RWST heating pump was placed in a condition consistent with BOP SI-18, "Removing the RWST Heating Pump and Heater from Service".

CORRECTIVE ACTION TO PREVENT FURTHER VIOLATION

- (1) Operating the RWST heating pump in the manual mode is a necessary function in order to take proper chemistry grab samples. Therefore, a modification will be made to the RWST heating pump circuitry to extend the high temperature heater cutoff function to the manual mode. In the interim, a caution card will be placed on the RWST heating pump control switch when the heater is in service, cautioning operators that the heater is energized and the high temperature cutoff interlock is defeated when the pump is operated in the manual mode.
- (2) An operating surveillance OBOS XHT-1, "High Temperature Equipment Protection", has been written to identify all areas that can be adversely affected by high temperature and to put into effect normal hot weather precautions. Included in this surveillance is a step to take the RWST heating pump heater out-of-service during hot weather conditions. The surveillance was in place July 29, 1985.
- (3) Operating procedures BOP SI-17 and BOP SI-18, placing the RWST heating pump in and out-of-service, respectively, will be revised. These revisions will clarify the title and purpose of the procedures and specifically allow for manual operation of the heating pump provided the necessary precautions are taken to monitor the RWST temperature.
- (4) This violation and response will be placed in the required reading program for all licensed operators.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

- (1) The RWST heating pump operation was in compliance with the appropriate procedures on June 16, 1985.
- (2) Revisions to operating procedures will be in place by December 1, 1985.
- (3) The modification to the RWST heating pump circuitry will be made prior to the end of the first refueling outage.
- (4) Licensed operators will read this violation and response by November 22, 1985.