



**Commonwealth Edison**

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Address Reply to: Post Office Box 767  
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August 1, 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  
I.E. Inspection Report  
No. 50-455/85004

Reference (a): July 2, 1985 letter from J. J.  
Harrison to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of inspections by Mr. I. T. Yin from July 27, 1984 to June 18, 1985. 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). This response also addresses your concern regarding the effectiveness of our previous corrective action to preclude recurrence.

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

10 CFR 50, Appendix B, Criterion V, as implemented by CECo Topical Report CE-1-A, "Quality Assurance Program for Generating Stations," and CECo Corporate Quality Assurance Manual, Nuclear Generating Stations, Quality Requirements, requires the licensee to accomplish safety-related activities in accordance with documented procedures.

Contrary to the above, the Boeing steam generator snubber life cycle requalification test reported in ITT-Grinnell (ITT-G) Summary Report SPS 8471-13-0 was not performed in accordance with the specified ITT-G test procedure No. 5, "Life Cycle Test to Evaluate Piston Ring and Cylinder Bore Wear," dated December 11, 1984.

#### CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The ITT Grinnell QA Manager was requested to perform a surveillance to determine if there was a violation of the ITT Grinnell QA Program during the life cycle testing. The surveillance determined that Sargent & Lundy, ITT Grinnell QA, and the ANI were notified prior to executing the test change. This notification was incorporated into the final test report and Sargent & Lundy documented the notification on a telephone memorandum. Although the notification was proper, there was a failure to formally document the approval of the notification prior to executing the test change. ITT Grinnell is now performing all assembly and testing only to procedures with documented approval.

In Reference (a), Commonwealth Edison was requested to address the apparent ineffectiveness of our previous corrective actions in precluding this recurrence. The corrective action (procedural control) which was instituted after the prior violation concerning the Paul Monroe testing was in place during the recent life cycle testing of the Boeing snubber. The notification system was part of this corrective action discussed above. We believe that the lack of training concerning this corrective action plan lead to the documentation failure associated with the life cycle testing.

#### CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

ITT Grinnell conducted a formal documented training session with their project personnel on June 28, 1985. The personnel were re-instructed on the applicable Quality Assurance requirements for performing all assembly and testing only to procedures with documented approval. It is our belief that this training has been effective.

The previous Paul Monroe and Boeing snubber developmental and type qualification testing entered into experimental areas where changes were to be expected. That phase of testing is now complete. The remaining functional testing is production type testing which is repetitive in nature and we do not expect that changes will be necessary. However, if changes to the production test procedures do become necessary, such changes will be documented in accordance with the requirements of the ITT Grinnell QA Manual.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The test procedure change was documented on February 21, 1985 in the Summary Report. The training session for ITT Grinnell project personnel was conducted on June 28, 1985.