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DMB

May 22, 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
I.E. Inspection Report
No. 50-454/85-009
NRC Docket No. 50-454

Reference (a): April 22, 1985 letter from R. F. Warnick
to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of inspections by Messrs. Hinds, Connaughton, Brochman, and Ms. McCormick-Barger at Byron Station from March 1 through April 1, 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,

K. A. Ainger

for D. L. Farrar
Director of Nuclear Licensing

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cc: Byron Resident Inspector

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ATTACHMENT A

VIOLATION 1a

Technical Specification 6.8.a requires that written procedures shall be established, implemented and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A to Regulatory Guide 1.33, Revision 2, dated February 1978 states: "...implementing procedures are required for each surveillance test, inspection, or calibration listed in the technical specifications..."

Byron Operating Surveillance Procedure 1BOS 3.4.2a-1 "Turbine Throttle, Governor, Reheat, and Intercept Valve Monthly Surveillance", Revision 1, dated January 8, 1985, Prerequisite C.3 states: "Impulse Pressure Feedback (IMP IN) must be in service."

Contrary to the above, on March 4, 1985, 1BOS 3.4.2a-1 was entered and partially performed with the turbine impulse pressure feedback out-of-service (IMP OUT).

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

As a result of the turbine trip that occurred during this surveillance activity on March 4, 1985, the requirement to complete the "Turbine Throttle, Governor, Reheat, and Intercept Valve Monthly Surveillance" was obviated. The surveillance has been rescheduled and will be completely executed when it becomes due.

The Unit 1 Operating Engineer emphasized to the Shift Engineer involved with the event that all temporary changes to approved station procedures must be made in accordance with Byron Administrative Procedure 1310-4, "Temporary Change to Permanent Procedures."

CORRECTIVE ACTION TO AVOID FURTHER NONCOMPLIANCE

At the monthly Shift Engineers meeting held on March 7, 1985, the necessity for complete procedure compliance and the proper method for making temporary procedure changes was emphasized to the Shift Engineers.

In addition, a copy of this violation and its response will be included in the required reading file for all licensed operators.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

This violation and response will be placed in the required reading file by May 31, 1985 and will be read by licensed operators by July 12, 1985.

VIOLATION 1b

Technical Specification 6.8.a requires that written procedures shall be established, implemented and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A to Regulatory Guide 1.33, Revision 2, dated February 1978 states: "...implementing procedures are required for each surveillance test, inspection, or calibration listed in the technical specifications...".

Byron Instrument Surveillance Procedure BIS 3.1.1-044, "Surveillance Functional Test for Loop Turbine Impulse Chamber Pressure LP505 Protection Channel I", Revision 4, dated February 26, 1985, Prerequisite C.3 states, "This procedure may be performed in Mode 1 above 10% power or Modes 3, 4, 5 and 6 providing the Reactor Trip Breakers are open."

Contrary to the above, on March 5, 1985, BIS 3.1.1-044 was utilized for investigation of turbine impulse pressure channel accuracy while in Mode 3 with the Reactor Trip Breakers closed.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

Subsequent to the reactor trip caused during the investigation of the turbine impulse pressure channel accuracy, troubleshooting on that pressure channel was performed properly in accordance with the applicable procedure.

The acting Master Instrument Mechanic emphasized to the Control System Technicians that all steps in procedures must be strictly followed regardless of the purpose for which the procedure is used.

CORRECTIVE ACTION TAKEN TO PREVENT FURTHER NONCOMPLIANCE

A short refresher training class on Reactor Trip System logic will be given to the Control System Technicians. A high visibility cover sheet will be placed on instrument surveillances that affect reactor trip inputs. In addition, a copy of this violation and response will be placed in the required reading file for licensed operators.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The high visibility cover sheet will be placed on the applicable instrument surveillances by May 31, 1985. A copy of this violation and response will be placed in the required reading file by May 31, 1985 and will be read by licensed operators by July 12, 1985. The training of the Control System Technicians will be completed by August 30, 1985.

VIOLATION 2

Technical Specification 6.2.2.f states: "Administrative procedures shall be developed and implemented to limit the working hours of....key maintenance personnel".

BAP 100-7, "Overtime Guidelines for Personnel that Perform Safety Related Functions" implements this requirement.

Contrary to the above, the requirements of BAP 100-7 were not complied with in 6 instances.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The Master Instrument Mechanic has emphasized to his management personnel the necessity to comply with all the requirements of BAP 100-7 when approving overtime for personnel performing safety-related functions.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

All Instrument Maintenance Department management personnel will be given a short instructional session on the specific implementation of and compliance with BAP 100-7, "Overtime Guidelines for Personnel that Perform Safety-Related Functions."

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Instruction to all Instrument Maintenance Department management personnel on specific implementation of and compliance with BAP 100-7 will be completed by May 31, 1985.

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