

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



February 10, 1997

LTR: BYRON 97-0030
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. 50-454/96009; 50-455/96009
NRC Docket Numbers 50-454, 50-455

REFERENCE: James L. Caldwell letter to Mr. Graesser dated
January 10, 1997, transmitting NRC Inspection
Report 50-454/96009; 50-455/96009

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 commitment:

1. Representatives from Engineering, Maintenance, Security, Radiation Protection, and Fire Protection will evaluate fire door signage expectations and determine the requirements. The resulting requirements will then be implemented, including a presentation of expectations to station personnel.

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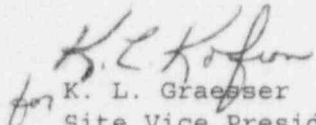
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Byron Ltr: 97-0030
February 10, 1997
Page 2

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,


for 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 (454/455-96009-06)

Byron Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the activities associated with Fire Protection Program implementation.

Byron Administrative Procedure, BAP 1100-3, "Fire Protection Systems, Fire Rated Assemblies, Ventilation Seals, and Flood Seal Impairments," Revision 10, states, in part, that a Barrier/Fire Protection Systems Impairment Permit, BAP 1100-3T1, shall be initiated by the department in charge of the work before a Barrier/Fire Protection System is taken out of service, impaired, or otherwise rendered inoperable.

Contrary to the above, on October 7, 1996, fire door D-846 (a barrier/fire protection system) was impaired without a Barrier/Fire Protection Systems Impairment Permit (50-455/96009-06(DRP)).

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

REASON FOR THE VIOLATION

Some of the fire doors have identifying signs installed on them, but not all of them. The expectation of some station personnel for fire door marking is that all fire doors were to be identified via an identification tag to alert personnel that the door was in fact a fire barrier. The fire barrier identification on the door would instantly alert workers and supervisors that the door could not be impaired without an FPIP. This expectation conflicted with the Fire Marshal's expectations and the present expectations expressed in the annual training. The station philosophy is that personnel consult with the Station Fire Marshal or alternate before propping open or impairing any door in the facility. Since all doors are not fire doors, no door should be impaired or left open without first finding out whether or not the door is a fire door.

Additionally, a programmatic deficiency was identified to exist in that a work group did not need an FPIP to impair a door that was already open with an FPIP attached for a job in progress by another work group. In this example, the job supervisor of the first job cleared his FPIP without considering the other work in progress and assumed the other job supervisor would initiate his own FPIP prior to the removal of the existing FPIP tag.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. The impairment to door D-846 was removed and the door closed.
2. A label identifying door D-846 as a fire door was added on 11/05/96.
3. The issue was reviewed with involved department personnel, emphasizing the importance of contacting the Fire Marshal and obtaining an FPIP prior to impairing any door.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

1. Representatives from Engineering, Maintenance, Security, Radiation Protection, and Fire Protection will evaluate fire door signage expectations and determine the requirements. The resulting requirements will then be implemented, including a presentation of expectations to station personnel. This will be tracked by NTS items 455-201-96-0608-01, 02, 03, 04, 05, 06.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 10/08/96 when the impairment to the door was removed and door D-846 was closed.