Commonwealth Edison Company
Byron Generating Station
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ComEd

November 15, 1996

LTR: BYRON 96-0295
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. 50-454/96007; 50-455/96007
NRC Docket Numbers 50-454, 50-455

REFERENCE: James L. Caldwell letter to Mr. Graesser dated October 18, 1996, transmitting NRC Inspection Report 50-454/96007; 50-455/96007

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 procedure, 2BVS 1.2.3.1-1, will be revised to include a reference to the applicable operating procedure for starting the CV Pump. The operating procedure verifies proper system line-up.

2. Involved Operators will be counselled on their responsibility to verify that conditions and alignments are correct before operating equipment.

3. Procedural guidance will be developed for aligning and running a Chemical and Volume Control System Charging Pump on recirculation. This procedure will include a verification that applicable lineups are complete as a prerequisite to starting the pump.

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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

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, Dowers Grove.

ATTACHMENT I

VIOLATION (454/455-96007-02)

10 CFR Part 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires in part, that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances.

Contrary to the above, on September 14, 1996, procedure 2BVS 1.2.3.1-1, "ASME Surveillance Requirements for Centrifugal Charging Pump 2A and Chemical and Volume Control System Valve Stroke Test," Revision 12, was inappropriate to the circumstance, in that, it failed to provide adequate steps to ensure that the essential service water system provided cooling to the 2A chemical and volume control pump lube oil cooler (50-455/96007-02(DRP)).

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

REASON FOR THE VIOLATION

The root cause of the 2A CV Pump being run on 09/14/96 without Essential Service Water cooling being valved into the oil coolers was the operator started the pump per 2BVS 1.2.3.1-1, step 3.6, without first verifying the pump was ready to be run per BOP CV-1b, "Startup of the CV System (Unit 2)".

The normal operating procedure governing the starting of 2A Centrifugal Charging Pump is BOP CV-1b which lists as Prerequisite #11, "Ensure that at least one SX Pump is running with a flowpath to the 2A CV Pump equipment to ensure adequate cooling to the 2A CV Pump Gear Cooler, Lube Oil Cooler, and Cubicle Cooler".

Since the intent of BOP CV-1b is to start a CV Pump in the normal charging mode of operation, it has been decided that procedural guidance addressing the start of a CV Pump in a recirculation mode of operation will be developed. The periodic ASME surveillance requires the CV pump to be operating in the recirculation mode.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. The immediate corrective action was to complete a verification of the lineup to support the running of the 2A CV Pump.

2. Station Engineering was consulted to ensure no operational limits had been exceeded.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

1. The procedure, 2BVS 1.2.3.1-1, will be revised to include a reference to the applicable operating procedure for starting the CV Pump. The operating procedure verifies proper system line-up. NTS Item #455-100-96-00702-01 will track this item to completion.

2. Procedural guidance will be developed for aligning and running a Chemical and Volume Control System Charging Pump on recirculation. This procedure will include a verification that applicable lineups are complete as a prerequisite to starting the pump. NTS Item #455-201-96-0471-01 will track this item to completion.

3. Involved Operators will be counselled on their responsibility to verify that conditions and alignments are correct before operating equipment. NTS Item #455-201-96-0471-02 will track this item to completion.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 9/14/96 when the SX valves were repositioned, and data reviewed to ensure no operational limits had been exceeded.