



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

September 5, 1985

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Byron Station Units 1 and 2
I.E. Inspection Report Nos.
50-454/85-011 and 50-455/85-008

Reference (a): August 6, 1985 letter from C. J.
Paperiello to Cordell Reed.

Dear Mr. Keppler:

Reference (a) provided the results of inspections by Messrs. Jacobson, Jones, Ward and Muffett at Byron Station Units 1 and 2 for the periods of March 18-21, 25-27, April 3-4, 9-11, 16-19, 22-23, May 15-16, 28, and July 1-3, 16-17, 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,

Anthony Miori
for D. L. Farrar
Director of Nuclear Licensing

lm

Attachment A

cc: Byron Resident Inspector

0606K

8509200071 850905
PDR ADOCK 05000454
Q PDR

SEP 9 1985

11
7E01

ATTACHMENT A

VIOLATION

1. 10 CFR 50 Appendix B, Criterion IX, as implemented by the CECO Quality Assurance Program, requires that special processes be controlled and be accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specification, criteria, and other special requirements.

Contrary to the above, the following examples of failure to control special processes were identified:

- a. Reliable Sheet Metal welding procedures did not properly address the required preheat in accordance with AWS D1.1, and attachments to structural members were welded without the required preheat (454/85011-02(a)(DRS)).
- b. A Reliable Sheet Metal welder having insufficient records to justify qualification in accordance with AWS D1.1 performed welds on heavy plate (454/85011-02(b)(DRS)).

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

- a. By test Reliable Sheet Metal qualified welds made to structural steel without the required preheat in accordance with AWS D1. This qualification showed that an acceptable joint was made using past procedures without preheat. (Reference RSM NR 093).
- b. The Reliable Sheet Metal welder, having insufficient activity level since initial qualification on heavy plate in accordance with AWS D1.1, was readministered the appropriate GMAW test in the Reliable Sheet Metal welding test booth. The test results showed he could still perform acceptable gas metal arc welding welds. Additionally, all welds made during the lapse in qualification were visually inspected by qualified visual weld inspectors.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

- a. Reliable Sheet Metal procedures used for welding to structural steel have been revised to incorporate the requirements of preheat per AWS D1.1. All production supervisory and welding personnel have been trained to these current preheat requirements.

- b. A review of all other welders qualified to the AWS D1.1 process showed proper qualification of other welders. Currently, Reliable Sheet Metal procedures require that a review of all active welders is done every six (6) months to ensure proper activity levels in each process per AWS D1.1.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

- a. September 5, 1985
- b. May 13, 1985

VIOLATION

2. 10 CFR 50 Appendix B, Criterion XVI, as implemented by the CECO Quality Assurance Program, requires that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, weld quality and inspection problems identified concerning the Reactor Containment Fan Cooler installations were not addressed in a timely manner in that four years elapsed between identification and resolution of the problems (454/85011-03(DRS)).

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Hunter, after improperly closing the original Nonconformance Report (NR 185), initiated a new nonconformance on March 6, 1985 (NR 1042). As part of the research into nonconformance NR 1042, it has been determined that the channel members and drain pans are not used to support the RCFC coils and are not required to function during a LOCA. As a result they have been classified as nonsafety-related. The remaining structural safety-related welds were mapped by inspectors in March, 1985, and found by Sargent and Lundy engineers to be adequate to perform their intended function. Final disposition on the RCFC installation was "use as is" as a result of safety classification change for the channel members and drain pans and the safety-related weld mapping calculations.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

A review of all Hunter nonconformances was made to determine if other similar premature closure of deficiencies had occurred. This review identified no further deficiencies. Additionally, the Hunter QA audit and surveillance program have been enhanced to assure that all deficiencies identified by either an audit or surveillance would be corrected prior to close-out of the respective report.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

March 28, 1985