



**Commonwealth Edison**

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August 28, 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  
NRC Inspection Report  
No. 50-454/85-033

Reference (a): August 13, 1985 letter from C. J.  
Paperiello to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of an inspection by Mr. VanDenburgh from July 9 through July 26, 1985 at Byron Station. During this inspection, a concern was brought to our attention regarding maintenance and troubleshooting efforts at the station and the level of documentation associated with these activities. This letter is to inform you of our actions to address the identified concern.

We have reviewed the concern discussed in section 2.d of the Inspection Report attached to reference (a) and agree that some aspects of our maintenance and troubleshooting efforts to address the P-8 control rod problem contributed to delays in achieving a timely resolution of the problem. Since the electrical components of the control rod drive system are classified as non-safety related, the documentation requirements for maintenance and troubleshooting of safety related equipment were not applied. Maintenance and troubleshooting techniques for the investigation of safety related equipment problems have provided a timely resolution of problems and a completely documented summary of the maintenance activities. Additional documentation that provided a written record of the activities associated with the series of P-8 control rod problems would have been useful to promote an expedient root cause determination and to help prevent possible miscommunications regarding the extent of the troubleshooting activities.

In light of this, Byron Station is developing a program for use on non-safety related equipment which is similar to the troubleshooting practices applied to safety related equipment. This program will be used whenever initial troubleshooting techniques do not reveal the root cause of a problem on non-safety related equipment.

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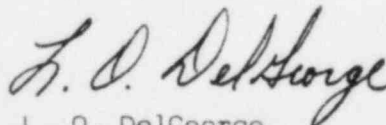
If a root cause determination cannot be made from the initial investigation of an equipment problem, the maintenance foreman will be required to obtain a "Maintenance Troubleshooting" checklist form from the work analyst. Implementation of this form will require the maintenance crew to repeat all their investigations and document on the checklist what troubleshooting actions have been performed. These actions will be performed again in an attempt to establish the root cause. If a root cause determination cannot be made upon completion of the second troubleshooting effort, the results of the investigation will be reviewed by station management to evaluate the adequacy of the troubleshooting. After a thorough review of the troubleshooting actions, management personnel will determine whether the actions are complete and reasonable prior to giving their approval to return the equipment to service.

If the deficient condition appears again after returning the equipment to service, the same troubleshooting technique will be repeated and the evaluation will be extended. The necessary resources will be provided to continue the investigation and resolve the problem. Offsite personnel will be consulted to help determine whether a Potentially Significant Event report should be generated.

A procedure to implement the program described above will be in place by September 30, 1985.

We believe the program described above will address the concern identified in the Inspection Report by providing complete documentation and analysis of problems involving non-safety related equipment whose root cause cannot be determined with a high degree of confidence. Additionally, this program should minimize the potential for miscommunication of information related to maintenance and troubleshooting of equipment as well as promoting timely resolution of difficult non-safety related equipment problems.

Very truly yours,



L. O. DelGeorge  
Assistant Vice President

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cc: Byron Resident Inspector

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