

NOTICE OF VIOLATION

Commonwealth Edison Company
Byron Station, Units 1 and 2

Docket Nos. 50-454; 50-455
Licenses No. NPF-37; NPF-66

During an NRC inspection conducted on March 3-7, 1997, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978.

- a. Regulatory Guide 1.33, Appendix A recommends that radiation protection procedures be implemented which cover contamination control.

Procedure BRP 5010-1 "Radiological Postings and Labeling Requirements," Revision 12, dated January 31, 1997, requires, in part, that areas with removable contamination greater than or equal to 1000 disintegrations per minute (dpm) per 100 square centimeters (cm²) be posted with a sign that states "CAUTION, CONTAMINATED AREA."

Contrary to the above, as of March 3 and 4, 1997, areas within the 1A and 2A chemical and volume control system pump rooms, the 2A safety injection pump room, and the 2A residual heat removal room which contained removable contamination of 1,000 to 6,000 dpm per 100 cm² were not posted with a sign that stated, "CAUTION, CONTAMINATED AREA." (50-454/97003-02a and 50-455/97003-02a)

- b. Regulatory Guide 1.33, Appendix A recommends that procedures be implemented which specify chemistry instructions and the calibration of laboratory instruments.

Procedure BCP 300-62, "Preparation of Gas Samples for Isotopic Analysis," Revision 4, dated November 14, 1996, requires that a 15 cubic centimeter gas vial be evacuated prior to containing a sample.

Contrary to the above, as of March 5, 1997, a chemistry technician failed to evacuate the gas vial prior to placing a sample in the vial. (50-454/97003-02b and 50-455/97003-02b)

- c. Regulatory Guide 1.33, Appendix A recommends that procedures be established which cover procedure adherence.

Contrary to the above, as of March 3, 1997, the licensee had not established procedures which cover adherence to chemistry procedures. (50-454/97003-02c and 50-455/97003-02c).

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

2. Technical Specification 6.8.4.d requires that a program be implemented which will ensure the capability exists to obtain and analyze reactor coolant samples, radioactive iodine and particulate samples in plant gaseous effluents and containment atmosphere samples under accident conditions.

Procedure BAP 560-10, "Byron Chemistry Post-Accident Program Description," Revision 2, dated December 2, 1996, requires, in part, that chemistry technicians receive semiannual training on the post accident sampling system (PASS) and receive training on PASS procedures at least every six months.

Contrary to the above, PASS training of chemistry technicians was not conducted from October 1995 to June 1996, a period in excess of six months. (50-454/97003-04 and 50-455/97003-04)

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

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting the Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in the Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois
this 4th day of April 1997