

NOV 21 1985

Docket No. 50-454

Docket No. 50-455

Commonwealth Edison Company

ATTN: Mr. Cordell Reed

Vice President

Post Office Box 767

Chicago, IL 60690

Gentlemen:

SUBJECT: BYRON STATION UNITS 1 AND 2, RESPONSE TO INSPECTION REPORTS  
NO. 50-454/85038 AND NO. 50-455/85042, NRC DOCKET NO. 50-454  
AND NO. 50-455

Reference: (a) Letter from W. D. Shafer to Cordell Reed dated October 1, 1985  
(b) Letter from D. L. Farrar to James Keppler dated October 31, 1985

Your response to the Notice of Violation associated with the inspection conducted by Mr. L. J. Hueter on August 28-29, 1985, of activities at Byron Station requests our reconsideration of the validity of Violation No. 2 for reasons stated in your response. In consideration of your request, we wish to clarify one item in your response and request additional information, not previously available, to continue our review.

In your response you state it is your understanding that the violation is predicated on the belief that initiation of the circulating water blowdown radiation monitor alarm indicates a release in excess of allowed limits, and therefore, requires immediate action per Technical Specification 3.11.1.1, and that such a belief is not correct. However, we wish to inform you that the violation is not predicated on the specific alarm setpoint but on the bases described below:

- Liquid radwaste having a concentration of 30 times MPC was pumped into the circulating water blowdown line.
- Intended dilution flow did not exist.
- The circulating water blowdown monitor alarmed within one minute, indicating a problem.
- An additional nine minutes elapsed before it was determined that a radwaste release had been initiated (causing the alarm) and the release terminated.

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- The blowdown line was closed at the downstream end and the line filled with dilution water providing an unknown mixing of the 2700 gallon radwaste bolus before release to the river.
- A sampling interval of 20 minutes compared with an expected discharge transit on the order of a minute, depending on dilution.

You assert in your response that you have subsequently performed additional analyses that demonstrate dilution of the bolus in the circulating water blowdown pipe was sufficient. Please submit the analysis for our further evaluation.

Sincerely,

W. D. Shafer, Chief  
Emergency Preparedness and  
Radiological Protection Branch

cc: D. L. Farrar, Director  
of Nuclear Licensing  
V. I. Schlosser, Project Manager  
Gunner Sorensen, Site Project  
Superintendent  
R. E. Querio, Plant Manager  
DCS/RSB (RIDS)  
Licensing Fee Management Branch  
Resident Inspector, RIII Byron  
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Diane Chavez, DAARE/SAFE  
Steve Lewis, ELD  
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H. S. Taylor, Quality Assurance  
Division

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Schumacher

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Forney

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Shafer