



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

DMB

February 5, 1986

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  
Licensee Event Reports  
NRC Docket No. 50-454

Reference (a): November 19, 1985 letter from J. G. Keppler  
to Cordell Reed

Dear Mr. Keppler:

We have reviewed the NRC's Office for Analysis and Evaluation of Operational Data (AEOD) assessment of Byron Unit 1 Licensee Event Reports (LER's). Based on the comments provided in the AEOD report, Byron Station has taken actions to improve the overall quality of their LER's.

It was noted as a general observation in the AEOD report that a large number of personnel are involved in writing LER's at Byron. In response to this, a limited number of "Lead Reviewers" have been designated. These personnel are being assigned to LER's to direct the investigative effort and to evaluate the report for conformance to the requirements of 10 CFR 50.73.

Eight specific deficiencies were discussed in the AEOD report. The action taken in response to each deficiency is described below.

Item 1 The I s did not contain any Energy Industry Identification System (EIIS) codes as required.

Training has been provided to personnel involved in the review and preparation of LER's detailing this requirement. Previous omissions were due to a misinterpretation of the requirement.

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- Item 2 The LER's did not discuss personnel error in sufficient detail.

A revision to the station's standard LER format has been made to focus attention on the requirement to detail the cause of the event. A writer's guide and LER review checklist have been prepared to ensure the requirement is met. A MORT (diagnostic) flowchart has been prepared to aid in determining the root cause of an event. Training has been provided on the use of this flowchart.

- Item 3 LER's involving component failures did not adequately identify the failed component.

In response to this, a section has been added to the station's LER format listing the minimum required information.

- Item 4 LER's did not provide adequate dates and times for various occurrences discussed in the text.

The writer's guide and review checklist include these requirements. This topic was also specifically included in training.

- Item 5 Text presentations are not presented in a structured format.

In response to this, the station's LER format has been revised to provide this structure.

- Item 6 LER abstracts were too short and some abstracts contained information not discussed in the text.

These concerns have been addressed in the writer's guide and review checklist.

- Item 7 LER title did not indicate the root cause of the event.

Byron's existing guidance was taken from NUREG-1022, page 22, which states for the title "Enter a concise description of the event which defines the principle problem... (e.g., "Inoperable Diesel Generators," "Reactor Trip",...)." The comments of AEOD and guidance of NUREG-1022 Supplement 2 have been incorporated into the writer's guide and LER review checklist.

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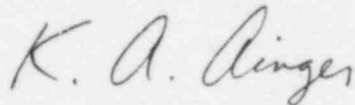
Item 8 Licensee contacts did not indicate a position title; LER Item 13 was completed when no component failure existed.

The concern regarding licensee contact position has been addressed in training. The information regarding LER Item 13 has been, and will continue to be, provided at the request of the NRC Resident Inspector.

Training for those personnel involved in writing LER's was completed by January 15, 1986.

Please direct any further questions regarding this matter to this office.

Very truly yours,



K. A. Ainger  
Nuclear Licensing Administrator

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cc: Byron Resident Inspector