



Commonwealth Edison

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DMB

June 14, 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
IE Inspection Report No.
50-454/85-016

References (a): May 16, 1985 letter from R. F. Warnick
to Cordell Reed.

(b): June 3, 1985 letter from R. E. Querio
to J. M. Hinds.

Dear Mr. Keppler:

Reference (a) provided the results of inspections by Messrs. Hinds, Brochman, Connaughton, and Butler at Byron Station from April 2 through May 1, 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).

In addition to the actions discussed in Attachment A to prevent recurrence of the specific examples of violation, Byron Station has initiated a "Conduct of Operations Improvement Program" to prevent recurrence of the types of noncompliance that are the subject of Violations 1 and 2. This program is described in reference (b).

Please direct any questions regarding this matter to this office.

Very truly yours,

K. A. Ainger

for D. L. Farrar
Director of Nuclear Licensing

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Attachment

cc: Byron Resident Inspector

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ATTACHMENT A

VIOLATION 1a

Technical Specification 3.0.2 states: "Noncompliance with a specification shall exist when the requirements of the limiting conditions for operation and associated ACTION requirements are not met within the specified time interval."

Byron Administrative Procedure, BAP 300-22, "Conduct of Operation" implements the requirements of Technical Specification 3.0.2 and states: "If any...condition indicates that a system is not operable as required by Technical Specifications, the Shift Engineer is to immediately begin the action required by the Technical Specifications as stated in the applicable LCOAR procedure."

Technical Specification 3.1.2.3 states, in part: "One charging pump...shall be OPERABLE and capable of being powered from an OPERABLE emergency power source...With no charging pump OPERABLE or capable of being powered from an OPERABLE emergency power source, suspend all operations involving...positive reactivity changes."

Contrary to the above, on December 26, 1984, while in mode 5, with the emergency power source for the 1B Centrifugal Charging Pump inoperable, the applicable LCOAR procedure was not implemented.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The 1A Centrifugal Charging Pump was restored to operable status in compliance with Technical Specification 3.1.2.3 on December 26, 1984.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The Shift Engineer and Shift Control Room Engineer have been instructed concerning the importance of maintaining proper plant status according to the Technical Specifications. In addition, a Technical Staff Memo has been written to stress the importance of maintaining an operable plant status during the performance of technical staff surveillances, operating surveillances, tests, and maintenance activities.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The 1A Centrifugal Charging Pump was restored to operable status on December 26, 1984.

VIOLATION 1b

Technical Specification 3.0.2 states: "Noncompliance with a specification shall exist when the requirements of the limiting conditions for operations and associated ACTION requirements are not met within the specified time interval."

Byron Administrative Procedure, BAP 300 22, "Conduct of Operation" implements the requirements of Technical Specification 3.0.2 and states: "If any...condition indicates that a system is not operable as required by Technical Specifications, the Shift Engineer is to immediately begin the action required by the Technical Specifications as stated in the applicable LOCAR procedure."

Technical Specification 3.4.4 states, in part: "With both PORVs inoperable due to causes other than excessive seat leakage, within 1 hour...close their associated block valves and remove power from the block valves..."

Contrary to the above, on January 19, 1985, while in mode 3, with both Pressurizer PORVs inoperable for reasons other than excessive seat leakage, the applicable LOCAR procedure was not implemented and the Pressurizer PORV block valves were not de-energized in the closed position within 1 hour.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The reactor coolant system was depressurized to normal operating pressure and the power operated relief valves and their block valves were returned to operable status.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The operating personnel involved in this event were rebriefed on the intent of the Technical Specification Limiting Condition for Operation.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on January 19, 1985 when the reactor coolant system was depressurized to normal operating pressure and the power operated relief valves and their block valves were returned to operable status.

VIOLATION 1c

Technical Specification 3.0.2 states: "Noncompliance with a specification shall exist when the requirements of the limiting conditions for operation and associated action requirements are not met within the specified time interval."

Byron Administrative Procedure, BAP 300-22, "Conduct of Operation" implements the requirements of Technical Specification 3.0.2 and states: "If any...condition indicates that a system is not operable as required by Technical Specification, the shift engineer is to immediately begin the action required by the technical specifications as stated in the applicable LOCAR procedures."

Technical Specification 3.3.3.1 requires that with Radiation Monitoring Instrumentation Channel ORE-PRO32B inoperable Train "A" of the Main Control Room Ventilation System be placed in the make-up mode within 1 hour.

Contrary to the above, on March 19, 1985, while in mode 5. with Radiation Monitoring Instrumentation Channel ORE-PRO32B inoperable, the applicable LOCAR procedure was not implemented and Train "A" of the Main Control Room Ventilation System was not placed in the make-up mode within 1 hour.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The Train "A" Main Control Room Ventilation System was immediately placed in the make-up mode.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The Shift Control Room Engineer involved in the event was cautioned regarding the importance of checking Technical Specifications applicability when switching trains of safeguards equipment.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on March 19, 1985, when the Train "A" Main Control Room Ventilation System was placed in the make-up mode.

VIOLATION 2a

Technical Specification 4.0.3 states: "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation."

Technical Specification 4.0.4 states, in part: "Entry into an OPERATIONAL MODE...shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval..."

Technical Specification 4.3.3.7.1 required that fire detection instruments shall be demonstrated OPERABLE at least once per 6 months by performance of a TRIP ACTUATING DEVICE OPERATIONAL TEST.

Contrary to the above, on October 31, 1984, mode 6 was entered without completing a TRIP ACTUATION DEVICE OPERATIONAL TEST for an ultraviolet fire detector.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The Technical Specification surveillance that was missed on October 31, 1984 was discovered on February 13, 1985. An hourly fire watch should have been established in the affected fire zone when the surveillance was missed. Although this was not accomplished on October 31, 1984, an hourly fire watch was established on December 21, 1984 for other reasons.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The Electrical Maintenance Department has been instructed by the station's surveillance coordinator to initiate an independent review of future work packages prior to considering a surveillance complete and successful.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on December 21, 1984, when an hourly fire watch was established in the affected fire zone.

VIOLATION 2b

Technical Specification 4.0.3 states: "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation."

Technical Specification 4.0.4 states, in part: "Entry into an OPERATIONAL MODE...shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval..."

Technical Specification 4.0.5.a requires inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves to be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Codes and applicable Addenda as required by 10 CFR 50.55a(g).

ASME Boiler and Pressure Vessel Code Section XI, Article IS-400 requires reinspection of components following repair or replacement, prior to resumption of operation.

Contrary to the above, on October 31, 1984 through March 18, 1985, the following components were returned to service following maintenance without having performed an ASME visual inspection: Valves 1CV066B, 1CV067A, 1BR003A, 1SI8948B, 1FW017D, 1RH030A and Pump OAB01PA.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

On March 18, 1985, when it was discovered that valves 1CV066B and 1CV067A were returned to service without having performed the required Technical Specification surveillance, an ASME visual inspection was subsequently completed with satisfactory results.

In addition to valves 1CV066B and 1CV067A, on March 18, 1985, it was also discovered that valves 1BR003A, 1SI8948B, 1FW017D, 1RH030A, and pump OAB01PA were returned to service without having performed the required inservice inspection. An ASME visual inspection of valves 1BR003A and 1RH030A was performed on March 28, 1985 with acceptable results. An acceptable visual inspection of valve 1SI8948B was completed on January 15, 1985. On April 1, 1985, the inservice inspection surveillance for pump OAB01PA was performed with satisfactory results. Valve 1FW017A has been isolated from service and will be inspected when the proper plant conditions exist.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Work requests, when received by the Operating Department following "QC Release" for testing, are now required to remain in the control room until testing requirements are complete. In addition, copies of work requests with pending testing requirements are being forwarded to the appropriate departments to assure completion in a timely manner.

A memo has been issued to Shift Personnel to clarify the procedural intent of processing work requests and removing and returning equipment out-of-service. Another memo has also been issued to clarify the method of expediting inservice inspection testing requirements and who can perform those requirements.

The Quality Control Department has attended a documented training session on verifying that the ISI group has specified testing requirements on safety-related work requests.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved when the required surveillance was performed for the respective components as described above.

VIOLATION 2c

Technical Specification 4.0.3 states: "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation."

Technical Specification 4.0.4 states, in part: "Entry into an OPERATIONAL MODE...shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval..."

The licensee's Preservice/Inservice Inspection Program Plan for valves requires that a Position Indication Test be performed every 3 years for valve 1SI8809A.

Contrary to the above, on March 10, 1985, Mode 3 was entered without performing a Position Indication Test on valve 1SI8809A.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

On January 10, 1985, mode 3 was entered without performing a Position Indication Test on valve 1SI8809A. This was discovered on January 24, 1985 and a Position Indication Test was successfully performed on valve 1SI8809A that same day.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The surveillance procedure which specifies valves that require a Position Indication Test is being revised to include the 1SI8809 valves. A revision to the station administrative procedure has been implemented to assure all revised ISI surveillances require a review by the ISI Coordinator prior to their implementation.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Position Indication Test for valve 1SI8809A was performed on January 24, 1985. The surveillance procedure for valves requiring a Position Indication Test will be revised to include the 1SI8809 valves by July 12, 1985.

VIOLATION 2d

Technical Specification 4.0.3 states: "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation."

Technical Specification 4.0.4 states, in part: "Entry into an OPERATIONAL MODE...shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval..."

Technical Specification 3.8.1.1.a specifies that with a required offsite electrical circuit inoperable, demonstrate the OPERABILITY of the remaining circuit by performing Technical Specification 4.8.1.1.a within 1 hour at least once per 8 hours thereafter.

Contrary to the above, on January 11-12, 1985, while in mode 3, Surveillance 4.8.1.1.a was not performed within 1 hour and within 8 hours thereafter, to demonstrate OPERABLE the remaining offsite electrical circuit.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

On January 11, 1985, the required surveillance was performed 5 hours after the offsite electrical circuit was taken out of service. The surveillance was performed late again, 12 hours after the first surveillance. The offsite electrical circuit was restored to operable status 6 hours after performance of the second surveillance.

CORRECTIVE ACTION TO AVOID FURTHER NONCOMPLIANCE

All licensed operators will read this violation and response by August 9, 1985.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on January 12, 1985 when the offsite electrical circuit was restored to operable status.

VIOLATION 2e

Technical Specification 4.0.3 states: "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation."

Technical Specification 4.0.4 states, in part: "Entry into an OPERATIONAL MODE...shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval...."

Technical Specification 4.8.1.3.a requires that the 2A Diesel Generator be demonstrated OPERABLE once per day.

Contrary to the above, on January 11, 1985, while in Mode 3, Surveillance 4.8.1.3.a was not performed to demonstrate the 2A Diesel Generator capable of providing power to Bus 141.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

When the missed surveillance was discovered on January 12, 1985, the 2A Diesel Generator surveillance was immediately performed with satisfactory results.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

A revision has been made to the shiftly and daily operating surveillance data package cover sheet. This revision lists the 2A Diesel Generator daily surveillance as a document to be attached to the package.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on January 12, 1985 when the 2A Diesel Generator daily surveillance was successfully performed.

VIOLATION 2F

Technical Specification 4.0.3 states: "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation."

Technical Specification 4.0.4 states, in part: "Entry into an OPERATIONAL MODE....shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval...."

Technical Specification 4.6.3.3 requires that containment isolation valves shall be stroke timed every quarter.

Contrary to the above, on January 16, 1985, while in Mode 3, the quarterly surveillance interval for Containment Isolation valve 1SD005C was exceeded.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The surveillance on valve 1SD005C was performed on January 17, 1985. The valve initially failed its acceptance criteria. After maintenance was performed on the valve, the surveillance was repeated with satisfactory results.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The surveillance program has been modified to identify components requiring an increased testing frequency and to notify supervisory personnel of surveillances which are nearing their due date.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on January 17, 1985 when the valve surveillance was performed with satisfactory results.

VIOLATION 2g

Technical Specification 4.0.3 states: "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation."

Technical Specification 4.0.4 states, in part: "Entry into an OPERATIONAL MODE...shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval..."

Technical Specification 4.7.10.3.1 requires that the Lower Cable Spreading Room CO₂ System be demonstrated OPERABLE at least once per 31 days.

Contrary to the above, the Lower Cable Spreading Room CO₂ System was not demonstrated OPERABLE in the months of January and February, 1985.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The Lower Cable Spreading Room CO₂ System was not operable in the months of January and February, 1985. However, it was not required to be demonstrated operable since a continuous fire watch was posted in the Lower Cable Spreading Room during the months of January and February, 1985. This was in accordance with the applicable LCO action requirement of the Technical Specification.

The monthly CO₂ System valve position surveillance was not performed for the remainder of the CO₂ System separate from the Lower Cable Spreading Room during the months of January and February. When this was discovered on March 13, 1985, the entire surveillance was performed. The Lower Cable Spreading Room failed again and the continuous fire watch remained in place.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The Station Surveillance Coordinator has been instructed to check failed surveillances against actions taken by the Shift Engineer to meet Technical Specification action statements in order to determine which portion of the surveillance must continue to be performed.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on March 13, 1985 when the entire CO₂ System valve position surveillance was performed.

VIOLATION 2H

Technical Specification 4.0.3. states: "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation."

Technical Specification 4.0.4 states, in part: "Entry into an OPERATIONAL MODE...shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval...."

Technical Specification 4.3.1.1 requires that the Turbine Emergency Trip Header Low Pressure Reactor Trip Surveillance be performed prior to a reactor startup.

Contrary to the above, on March 1, 1985, Mode 2 was entered without performing a Turbine Emergency Trip Header Low Pressure Reactor Trip Surveillance.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The missed surveillance was discovered on March 2, 1985 and was immediately performed with satisfactory results.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The surveillance computer program has been changed to include this surveillance in the non-routine list for entering Mode 2.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on March 2, 1985 when the surveillance was satisfactorily performed.