

Commonwealth Edison Company
Byron Generating Station
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May 5, 1997

ComEd

LTR: BYRON 97-0106
FILE: 1.10.0101

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Byron Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report No. 50-454/97003; 50-455/97003
NRC Docket Numbers 50-454, 50-455

Reference: Geoffrey E. Grant letter to Mr. Graesser dated
April 4, 1997, transmitting NRC Inspection
Report 50-454/97003; 50-455/97003

Enclosed is Commonwealth Edison Company's response to the Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited two (2) Severity Level IV violations requiring a written response. ComEd's response is provided in the attachment.

This letter contains the following commitments:

- 1) To assist Radiation Protection (RP) in identifying contamination control concerns as conditions in the plant change between routine surveys, operating personnel will receive additional training on identifying contamination hazards.
- 2) In addition to establishing priorities for decontamination activities, the RP Department will also assist Operating in initiating action requests for leaking equipment which has not yet been tagged.
- 3) Chemistry personnel, along with Office Support, are developing a new procedure BAP 1310-10, "Procedure Use and Adherence" to address Regulatory Guide 1.33, Appendix A requirements.

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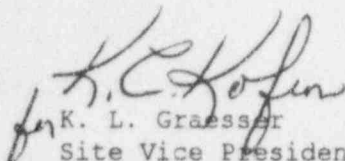


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If your staff has any questions or comments concerning this letter, please refer them to Don Brindle, Regulatory Assurance Supervisor, at (815)234-5441 ext.2280.

Respectfully,


for K. L. Graesser
Site Vice President
Byron Nuclear Power Station

KLG/DB/rp

Attachment(s)

cc: A. B. Beach, NRC Regional Administrator - RIII
G. F. Dick Jr., Byron Project Manager - NRR
S. D. Burgess, Senior Resident Inspector, Byron
R. D. Lanksbury, Reactor Projects Chief - RIII
F. Niziolek, Division of Engineering - IDNS
D. L. Farrar, Nuclear Regulatory Services Manager, Downers Grove
Safety Review Dept, c/o Document Control Desk, 3rd Floor, Downers Grove
DCD-Licensing, Suite 400, Downers Grove.

ATTACHMENT I

VIOLATION (454/455-97003-02)

Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, 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 I).
(50-454/455-97003-02a, b, c(DRS))

REASON FOR THE VIOLATION

a. Radiological Posting and Labeling Requirements (50-454/455 97003-02a)

Per BRP 5010-1, "Radiological Posting and Labeling Requirements", areas with removable contamination greater than 1000 dpm/100 cm² are required to be posted with a sign that states, "Caution Contaminated Area". Contrary to this requirement, Radiation Protection did not post the 1/2A Chemical and Volume Control (CV) Pumps, the 2A Safety Injection (SI) Pump, and the 2A Residual Heat Removal (RHR) Pump as contaminated areas. Radiation Protection did not identify contamination on routine plant surveys of these areas due to a lack of attention to detail. BRP 6020-3, "Routine Plant Surveys", requires contamination surveys of work surfaces, equipment, and floors to support general access. However, the contamination surveys were not performed in sufficient detail to identify the contamination on the pump seals. It was apparent that the pump seals had leaked primary system water which after evaporation, resulted in a collection of dried boron which is a known contamination hazard.

The Radiation Protection Department is committed to maintaining high material condition standards in radiologically posted areas to ensure minimal radiological impediments to safety related equipment. To achieve this goal, aggressive goals have been established for minimizing contaminated area square footage in the plant. By maintaining good housekeeping practices, radiological hazards are reduced and personnel contamination events are minimized.

b. Preparation of Gas Samples for Isotopic Analysis (50-454/455 97003-2b)

The set-up of instrumentation and analysis for a gas sample was being performed by two (2) Chemistry technicians. The gas vial was not evacuated due to a miscommunication between the technicians. The status of the analysis activities was not properly maintained.

c. Procedure Adherence Procedure (50-454/455 97003-2c)

Chemistry Department Policy 200-3 covers procedure adherence, additionally Site Policy Memo 200-14 governs the use of procedures. Personnel had improperly relied on policies and memos in lieu of an approved procedure for providing guidance on adherence to procedures.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Individual corrective actions with regard to the Notice of Violation is as follows:

a. Radiological Posting and Labeling Requirements (50-454/455 97003-02a)

1. To emphasize procedure compliance and material condition priorities, Radiation Protection management reviewed department expectations during continuing training sessions which concluded in March 1997. Jointed discussions on survey expectations focused on the importance of properly identifying and posting contamination hazards. All Radiation Protection Laboratory Supervisors and Technicians attended this training.

2. All routine plant general area surveys as documented on BOP 6020-TB, "RP Lab Supervisor Routine Checklist", have been completed since management expectations were presented and no additional contaminated areas were found that were not posted.
- b. Preparation of Gas Samples for Isotopic Analysis (50-454/455 97003-2b)
1. The chemistry technicians were counseled on the need for proper communication since they were involved in preparing the sample vial and did not communicate its actual status.
 2. Preparation procedures in the Hot Lab and sampling procedures in HRSS have been placed in plastic covers and marking pens will be used to mark steps.
- c. Procedure Adherence Procedure (50-454/455 97003-2c)
1. None

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

- a. Radiological Posting and Labeling Requirements (50-454/455 97003-02a)
1. To assist Radiation Protection (RP) in identifying contamination control concerns as conditions in the plant change between routine surveys, operating personnel will receive additional training on identifying contamination hazards. Operating has successfully identified equipment issues through the action request process in the past. Operating will now also notify RP when they identify adverse conditions, such as leaking equipment, to ensure proper radiological controls are established. Training Revision Request (TRR) 97-810 will track this training.
 2. In addition to establishing priorities for decontamination activities, the RP Dept. will also assist Operating in initiating action requests for leaking equipment which has not yet been tagged. This will also assist RP in reducing repeat decontamination by ensuring the cause of the leak is addressed. TRR 97-809 will track training RP on submitting action requests.
- b. Preparation of Gas Samples for Isotopic Analysis (50-454/455 97003-2b)
1. None

c. Procedure Adherence Procedure (50-454/455 97003-2c)

1. To meet Regulatory Guide 1.33, Appendix A requirements, Chemistry personnel, along with Office Support personnel, are developing a procedure usage procedure. The new procedure BAP 1310-10, "Procedure Use and Adherence", will be applicable to all Site personnel. NTS# 454-100-97-00302c-01 tracks this action.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

a. Radiological Posting and Labeling Requirements (50-454/455 97003-02a)

Full compliance was achieved on 3/4/97 when the proper boundaries and postings were placed around the affected areas.

b. Preparation of Gas Samples for Isotopic Analysis (50-454/455 97003-2b)

Full compliance was achieved on 3/5/97 when the gas sample and analysis was performed in accordance with the procedure.

c. Procedure Adherence Procedure (50-454/455 97003-2c)

Full compliance will be achieved by 8/29/97 when the procedure is completed, approved for use, and site personnel have been trained. This issue was initially identified in the Chemistry area, training for Chemistry personnel will be completed by 7/15/97.

ATTACHMENT II

VIOLATION (454/455-97003-04)

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 I).
(50-454/455-97003-04 (DRP))

REASON FOR THE VIOLATION

In 1993, the Chemistry and Training Departments reviewed technician training for post-accident and revised the frequency as documented in Byron Letter 93-0312. Byron Training Procedure (BTP) 300-29, "Chemistry Department Training Program", was revised at the that time and the frequency of PASS training was changed to annually. BAP 560-10, "Byron Chemistry Post-Accident Program Description", was not revised to reflect the new requirements stated in BTP 300-29.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. BAP 560-10 was revised to clarify the requirements of PASS training for technicians.
2. Chemistry and Training personnel performed a review to assure that other training requirements are consistent between the administrative and training procedures.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

1. None

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 4/29/97 with the completion of the revision to BAP 560-10.