

APPENDIX A

NOTICE OF VIOLATION

Consolidated Edison Company of New York, Inc.  
New York, New York 10003

Docket No. 50-247  
License No. DPR-26

As a result of the inspection conducted on December 1 - 19, 1980 and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. Technical Specification 6.8.1 states in part, "Written procedures and administrative policies shall be established, implemented and maintained ..."

The Final Safety Analysis Report shows in Figure 6.2-1, Safety Injection System Flow Diagram, the RHR pump suction and discharge valves being locked open.

Facility Procedure COL-51, Locked Valves Check-off List, states, "Valves shall be verified in position designated." For RHR pump suction and discharge valves the designated position is locked open.

Contrary to the above, the COL-51 completed on April 9, 1979 showed that the facility was being operated with the RHR pump suction and discharge valves not locked open. Also, records for various periods of 1980 are not clear as to whether or not the valves were or were not locked open as required.

This is a Severity Level V Violation (Supplement I.E).

- B. Technical Specification 6.8.1 states in part, "Written procedures and administrative policies shall be established, implemented and maintained ..."

Station Administrative Order (SAO) No. 104, Maintenance Work Request (MWR) procedure specifies the preparation, processing, work completion and return of equipment to service, and record retention for MWR's.

Contrary to the above, MWR No. 8728, 8729 and 8730 written to correct missing handwheels on RHR pump suction and discharge valves were not processed as required and consequently, the work was not accomplished nor its completion recorded as required by SAO No. 104.

This is a Severity Level V Violation (Supplement I.E).

- C. Technical Specification 6.11, Radiation Protection Program states, "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

Health Physics Procedure No. 1.2, Administrative Radiation Exposure Control, Revision 5, August 15, 1979, Step 8.1.1 states in part, "All operations shall be planned and executed in such a manner as to minimize the cumulative radiation exposure to the employees of Con Edison, its visitors and contractors..."

Contrary to the above, employee radiation exposure was not minimized in that, on December 8, 1980, employees had to operate the RHR pump suction and discharge valves in a 140 MR/HR field because the valve reach rods were missing.

This is a Severity Level V Violation (Supplement I.E).

- D. Technical Specification 6.8.1 states in part, "Written procedures and administrative policies shall be established, implemented and maintained ..."

Station Administrative Order No. 116, Housekeeping Policy, Revision 0, November 2, 1977, Section B.1.b. states, "Emergency Duty Inspections - Each week, a key Nuclear Power Generation management person is designated as NPG Emergency Man-on-Duty. One of his functions is to perform off-hour inspections, and submit a written report to the Plant Manager's office on the status of Station housekeeping."

Contrary to the above, no written reports for 12 of the 49 weeks from January 1 through December 10, 1980 were on file, and reports prepared for weeks of September 20, 1980 and July 13, 1980 had not yet been reviewed.

This is a Severity Level V Violation (Supplement I.E).

Pursuant to the provisions of 10 CFR 2.201, Consolidated Edison Company of New York, Inc., is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated

1/23/81

EJ Brunner

Eldon J. Brunner, Chief  
Reactor Operations and Nuclear  
Support Branch