

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket Nos. 50-255; 50-265; 50-237
50-249; 50-295; 50-304

As a result of the inspection conducted at Quad-Cities Nuclear Power Generating Station on February 23-27, and March 9-13, 1981 and the inspections at Zion Nuclear Power Generating Station and Dresden Nuclear Power Generating Station on March 17 and 18, 1981, respectively and in accordance with the Interim Enforcement Policy 45 FR 66754 (October 7, 1980), the following violations were identified: Item 1 is applicable to all three stations. The remainder apply to Quad-Cities Nuclear Power Generating Station only.

1. 10 CFR 50, Appendix B, Criteria II, states in part, "The applicant shall establish at the earliest practical time, consistent with the schedule for accomplishing the activities, a quality assurance program which complies with the requirements of this appendix. This program shall be documented by written policies, procedures, or instruction and shall be carried out throughout plant life in accordance with these policies, procedures, or instructions."

Commonwealth Edison Company quality assurance program commits to implementing ANSI N18.7-1976 for all their nuclear power plants through Regulatory Guide 1.33 Revision 2, as stated in the Quality Assurance Program Topical Report, CE-1-1A, Revision 14 and 15.

Contrary to the above, Quad-Cities, Zion, and Dresden Nuclear Power Generating Stations are not implementing portions of ANSI N18.7-1976. Examples of the failure to implement ANSI N18.7-1976 for each station are listed below:

a. Quad-Cities

- (1) A formal preventive maintenance program does not exist to the extent required by Paragraph 5.2.7.1 of ANSI N18.7-1976. (Paragraph 14)
- (2) A fluid/system cleanliness program does not exist to the extent required by Paragraph 5.2.10 of ANSI N18.7-1976 and ANSI N45.2.1-1973. (Paragraph 16)
- (3) A housekeeping program does not exist to the extent required by Paragraph 5.2.10 of ANSI N18.7-1976 and N45.2.3-1973. (Paragraph 16)

- (4) A records program does not exist to the extent required by Paragraph 5.2.12 of ANSI N18.7-1976 and ANSI N45.2.9-1974. (Paragraph 8)
- (5) Calibration procedures do not exist for safety-related instruments to the extent required by Paragraph 5.3.7 of ANSI N18.7-1976. (Paragraph 12)

b. Dresden and Zion

- (1) A fluid system cleanliness program does not exist to the extent required by Paragraph 5.2.10 of ANSI N18.7-1976 and ANSI N45.2.1-1973. (Paragraph 2)
- (2) Calibration procedures do not exist for safety-related instruments to the extent required by Paragraph 5.3.7 of ANSI N18.7-1976. (Paragraph 2)
- (3) A housekeeping program does not exist to the extent required by Paragraph 5.2.10 of ANSI N18.7-1976 and ANSI N45.2.3-1973. (Paragraph 2)

This is a Severity Level V violation (Supplement I).

2. 10 CFR 50, Appendix B, Criteria IV, states in part, "Measures shall be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment, and services, whether purchased by the applicant or by its contractors or subcontractors."

10 CFR 50, Appendix B, Criteria VII, states in part, "Measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. Documentary evidence that material and equipment conform to the procurement requirements shall be available at the nuclear power plant or fuel reprocessing plant site prior to installation or use of such material and equipment."

Commonwealth Edison Company states in part in their Quality Assurance Program Topical Report, CE-1-A, Revision 14 and 15, Section 4 - Procurement Document Control, "Quality Assurance Program requirements are included as are regulatory, code, standard and design requirements."

Contrary to the above requirements, the following examples of noncompliance were identified:

- a. Orders placed with Instrument Associates for instrument tube fittings and valves, did not specify the applicable grade/type of stainless steel necessary to assure adequate quality as required by Sargent and Lundy design specifications. Purchase order no. 226863 and the numerous releases on blanket purchase order no. 501345 are examples of this grade/type omission. (Paragraph 6)
- b. Valves were received and accepted on purchase order numbers 226863, 501345 release No. 67, and 501345 release No. 88 without documentation that the valves conformed to the procurement document requirements. (Paragraph 6)
- c. The valves received on purchase order No. 226863 were installed in a safety related, ATWS modification, without documentary evidence that the material conformed to the procurement requirements. (Paragraph 6)

This is a Severity Level V violation (Supplement I).

3. Technical Specification 1.7.B.1 states that a monthly operability test of the standby gas treatment system is required, during which a 4000 cfm ($\pm 10\%$) system flow shall be established.

Administrative procedure QAP-400-3, which is required to be adhered to by Technical Specification 6.2.A.7, states that a Deviation Report is required "When a safety related component or system . . . is found to vary significantly from the system specifications."

Technical Specification 6.6.B.1.b requires prompt notification with written followup for "operation of the unit of affected systems when any parameter or operation subject to a limiting condition is less conservative than the least conservative aspect of the limiting condition for operation established in the technical specifications."

Contrary to the above, a monthly operability test of the A train of the standby gas treatment system was performed on August 8, 1980 for which the system flow was recorded as 3480 cfm. No Deviation Report, notification or written followup was initiated. (Paragraph 13)

This is a Severity Level V violation (Supplement I).

4. 10 CFR 50, Appendix B, Criterion III, Design Control states in part that design changes shall be subject to design control measures commensurate with those applied to the original design and that they be approved by the organization that performed the original design.

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Commonwealth Edison Company states in part in their Quality Assurance Program Topical Report, CE-1-A, Revision 14 and 15, Section 3 - Design Control, "Design evaluations of modifications will be commensurate with those applied to the original design.

10 CFR 50.59 states in part that the licensee shall maintain records of changes in the facility and . . . these records shall include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, a nitrogen purge system to the SRM and IRM detector connectors was installed in Quad-Cities Unit 2 by means of only Maintenance Work Request No. Q03507. This bypassed the established system for processing a plant design change or modification. Furthermore, a documented Safety Review could not be provided for this modification.

This is a Severity Level V violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within twenty-five days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) 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.

Date

5/1/81

R. J. Spencer
C. E. Norelius, Acting Director
Division of Engineering and
Technical Inspection