

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-237

Docket No. 50-249

As a result of the inspection conducted on April 2-3, 6-7, 9-10, 1981, and in accordance with the Interim Enforcement Policy, 45FR66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 50, Appendix B, Criteria XVI states in part, "Measures shall be established to assure that conditions adverse to quality, such as ... defective material and equipment ... are promptly... corrected."

Commonwealth Edison Company Quality Assurance Program Topical Report CE-1-A, Revision 15, Section 16.0, states in part, "A corrective action system will be used to assure that such items as...defective material and equipment...which are adverse to quality and might affect the safe operation of a nuclear generating station are promptly...corrected."

Contrary to the above, fire barrier penetration seals which separate fire areas containing safety related equipment and/or cabling were identified by the licensee as defective in October, 1979 and had not been repaired when examined by the inspector on April 7, 1981. The time period that these seals have been defective is excessive and does not represent prompt correction of defective material and equipment.

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

2. 10 CFR 50, Appendix B, Criteria VIII, states in part, "Measures shall be established for the identification and control of materials, parts and components ... These measures shall assure that identification of the item is maintained ... either on the item or on records traceable to the item, as required throughout ...use of the item. These identification and control measures shall be designed to prevent the use of ... defective ... parts and components."

Commonwealth Edison Company Quality Assurance Program Topical Report CE-1-A, Revision 15, Section 8.0, states in part, "A system of controls will be utilized to prevent the use of...items which have not received the required inspections and tests. Materials, parts, and components... will have their identity marked on the item or on tags and records traceable to the item."

Contrary to the above, there is no traceability of hydrostatic test records to fire hoses used in safety related areas either by hose serial number or by test data recorded on the hoses. This could result in use of defective equipment.

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

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3. Technical Specification, Section 6.2.A.11., states in part, "Detailed written procedures ... shall be prepared, approved, and adhered to ... Fire Protection Program implementation."

Contrary to the above, four fire protection program implementing procedures were not being adhered to as described below:

- a. Fire extinguisher inspection tags were not being utilized as specified in procedures DFPP 4114-2, "Reactor Building, Radwaste, Cribhouse and Yard Loop Monthly Inspection," and DFPP 4114-3, "Turbine Buildings Monthly Inspection."
- b. Checklists for procedure DFPP 4114-4, "Master List of Portable Fire Extinguisher Annual Inspection Extinguisher Numbers," were not being properly completed, and hydrostatic testing was not being performed on carbon dioxide extinguishers in the specified time period.
- c. Checklists for procedure DAP 3-11, "Plant Cleanliness Inspection Program," were not being fully utilized to document followup actions on housekeeping problems and compressed gas bottles were not being stored as specified in the procedure.

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

4. Technical Specification, Section 3.12.A, states,
- "1. As a minimum, the fire detection instrumentation for each fire detection zone shown in Table 3.12-1 shall be operable at all times when equipment in that fire detection zone is required to be operable.
  2. With the number of operable fire detection instruments less than required by Table 3.12-1;
    - a. Perform an inspection of the affected zone, if accessible, within 1 hour. Perform additional inspections at least once per hour except in inaccessible areas.
    - b. Restore the inoperable instrument(s) to operable status within 14 days, or prepare and submit a report to the Commission pursuant to Specification 6.6.B.2 within the next 30 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to operable status."

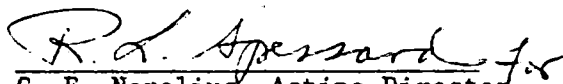
Table 3.12-1 states that the minimum number of smoke detection instruments required to be operable in the Unit 2/3 Control and Computer Rooms HVAC system is three.

Contrary to the above, all of the Unit 2/3 Control Room and Computer Room HVAC System smoke detection instruments were out of service for approximately one year (third quarter 1979 until September, 1980). The license management (Station Fire Marshall) was initially aware of the out of service situation, but failed to comply with the technical specification action statements until the situation became a finding in a quality assurance audit in August, 1980.

This is a Severity Level IV 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.

Dated JUN 04 1981

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