

APPENDIX A  
NOTICE OF VIOLATION

Philadelphia Electric Company

Docket Nos. 50-277  
50-278

Based on the results of an NRC inspection conducted June 18-21 and June 25-29, 1979, it appears that several of your activities were not conducted in full compliance with the conditions of your NRC facility license nos. DPR-44 and DPR-56 as indicated below. Items A, B, C and D are infractions.

- A. Technical Specification 6.8.1 states that written procedures shall be established, implemented, and maintained.

Procedure A-2, for the control of procedures, Revision 14, Paragraph 5(A) states that shift personnel shall follow the controlled procedures to perform plant operations.

Surveillance test (ST) 10.4, relief valve manual actuation, test results, section A, states that the signatures of this section signify that all the asterisked and "ISI letter I" steps were completed satisfactorily; and section B states, that if any asterisked or ISI letter I step was completed unsatisfactorily then shift supervision and the plant superintendent or alternate shall be notified immediately. ST 10.4 also states that Table 2 required data be recorded before and after the relief valve test.

Contrary to the above:

- ST 10.4, performed May 19, 1978, was signed off as being satisfactorily completed by the control room operator, who performed the test, shift supervision, and plant staff supervision without the required data being recorded in Table 2.
- ST 10.4, performed June 16, 1979, was signed off as being satisfactorily completed by the performer of the test and shift supervision without the acceptance criteria of the only asterisked I step in the test not being satisfied. Further, the notifications required as a result of the unsatisfactory completion of an asterisked I step were not made.
- ST 10.4, performed June 21, 1979, as a result of the unsatisfactory completion of the June 16, 1979 test, was signed as being completed satisfactorily by the person who performed the test and shift supervision without the required post test table 2 data being recorded. Also, Table 3 acceptance data was not intelligible.

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- B. 10 CFR 50, Appendix B, Criterion XVI states in part: "Measures shall be established to assure that conditions adverse to quality...are promptly... corrected...." The accepted Quality Assurance Program Description, FSAR Section 17.B.9.d states in part: "...The PECO QA Program accepts for close out of an audit finding of an unsatisfactory situation only completed corrective action...The audited organization is required to report to PECO the action taken, normally within 45 days of the date of the audit report transmittal letter...."

QAI 18-6, Revision 0, July 10, 1978, Section 6.9.3 states in part: "...if requested by the audited organization...the Audit Team Chairman may extend the due date...." Section 6.9.5 states in part: "When a response becomes 30 days overdue the Audit Team Chairman shall prepare a letter for signature by the Manager, Quality Assurance, requesting the audited organization...to take immediate action to report corrective action taken." and Section 6.8.5.6 states "The transmittal letter shall include the number of days from the date of the transmittal letter when corrective action taken must be reported (normally 30 days)."

Contrary to the above, corrective action with respect to findings on the following audit reports were not received within 45 working days, or the time frame specified on the transmittal letter, did not have requests for extension submitted by the audited organization, and did not have followup letter submitted by the auditing organization requesting corrective action reports.

	<u>Audit Report</u>	<u>Report Issued</u>
--	OP-34	June 6, 1978
--	OP-36	June 2, 1978
--	OP-57	February 14, 1979
--	OP-50	February 14, 1979
--	OP-26	*June 30, 1977

- C. 10 CFR 50, Appendix B, Criterion II states in part: "The applicant shall establish...a quality assurance program.... This program shall be documented by written policies...and shall be carried out in accordance with those policies...."

"The Accepted Quality Assurance Program Description, FSAR Section 17.2.B.9 states in part: "the engineering and research department follows the guidance of ANSI N45.2.12...."

\*For the purpose of this inspection, corrective action time "0" was July 10, 1978 which was the date QAI 18.6 was issued.

ANSI N45.2.12, section 4.4.6 states in part: "the audit report shall be issued within 30 days after the audit."

Contrary to the above the following audit reports were issued in excess of 30 working days after the audit.

<u>Audit Report</u>	<u>Audit Ended</u>	<u>Report Issued</u>
OP-35	6-6-78	8-1-78
OP-49	12-5-78	3-12-79
OP-50	10-4-78	2-14-79
OP-53	11-9-78	1-3-79
OP-54	11-29-78	2-27-79
OP-58	2-7-77	5-1-79

- D. 10 CFR 50, Appendix D, Criterion XIII, states in part: "measures shall be established to control the...storage...of material and equipment...to prevent damage or deterioration..." PBAPS FSAR, section 17.2, Appendix 17.2.A, paragraph 9, states in part: "PECO shall comply with Regulatory Guide 1.38, 3/16/73, and ANSI N45.2.2-1972..." ANSI N45.2.2, paragraph 6.2.2 states in part: "cleanliness and good housekeeping practices shall be enforced at all times in the storage areas. The storage areas shall be cleaned as required to avoid the accumulation of trash, discarded packaging materials..." Paragraph 6.3.1 states in part: "All items shall be stored in such a manner as to...minimize risk of damage." Paragraph 6.3.3 states in part that "hazardous chemicals, paints, solvents, and other materials of a like nature shall be stored in well ventilated areas which are not in close proximity to important nuclear plant items."

Contrary to the above, the following general conditions existed in the Stores Division Storeroom in the South Warehouse on June 18, 1979:

- Used beverage containers, discarded packing material, and other trash consisting of paper and cardboard littered the storeroom.
- Several containers of flammable liquid was stored next to acceptable Q-listed material and in close proximity to the above mentioned accumulation of trash.
- Many accepted Q-listed items (O-rings, small electrical components) were stored in a large cardboard box. Larger heavy metal items were stored on top in this same container in such a manner as to easily cause damage to the other items stored.