

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison
Company

Docket No. 50-373
Docket No. 50-374

Based on the inspection conducted on November 6-9, 1978, it appears that certain of your activities were not conducted in conformance with NRC requirements, noted below. These items are infractions. Infractions 1 through 5 apply to Unit 1. Infractions 1, 2, 4, and 5 apply to Unit 2.

1. 10 CFR 50, Appendix B, Criterion IV requires, in part, that "Measures shall be established to assure that applicable . . . design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, . . ." Paragraph D.3.7.1.2 of the PSAR states, in part, "The specifications will include a complete description of the functional design requirements."

Contrary to the above, the procurement specification for mechanical snubbers lacks specific functional and qualification testing requirements; the engineering evaluation for substituting mechanical snubbers for the hydraulic snubbers was not available for all sizes; and the mechanical snubber vendor material certification did not identify deviations to the specification requirements.

2. 10 CFR 50, Appendix B, Criterion V requires, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures. . ." Paragraph D.2.3.2.7 of the PSAR states, in part, "Erectors will have a QA program which includes procedures and instructions for . . . erection methods, . . . recording and retention of QA data."

Contrary to the above, the procedure for installing hangers and snubbers was deficient in that the manufacturer's instructions were not included or referenced; the installation tolerances were not specified; the procedure did not address temporary installation and inspection of snubbers; and the procedure did not contain a detailed inspection checklist identifying all areas to be inspected and provide a means to record those deviations identified.

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3. 10 CFR 50, Appendix B, Criterion X requires, in part, that "A program for inspection of activities affecting quality shall be established and executed by or for organization performing the activity to verify conformance with the documented instructions, procedures. . .for accomplishing the activity." Paragraph D.2.3.6.2 of the PSAR states, in part, "All inspection. . .involved in proving that. . .erection is accomplished the desired objective, will be performed in accordance with documented instructions."

Contrary to the above, not only was the QC inspection procedure deficient as stated in Infraction 2 above, the QC inspectors did not follow the requirements established in the procedure in that not all the items had been verified. Further, nonconformances such as excessive gaps between the pipe shear lugs and the clamp and the missing bolts on mechanical snubbers, had not been identified by the QC inspectors.

4. 10 CFR 50, Appendix B, Criterion XV requires, in part, that "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use. . ." Paragraph D.2.4.7 of the PSAR states, in part, "The effort of the QA program is to assure that equipment and material conform to the applicable drawings and specifications. A system has been developed, documented and implemented to assure that equipment and materials falling outside the applicable requirements will be revealed and reported in a systematic and timely manner."

Contrary to the above, several constant spring hangers were installed when they were classified as non-safety and subsequently, were reclassified as safety items. Nonconformance reports were not initiated to document this reclassification and to resolve QC problems such as the missing identification of weld filler metal heat numbers.

5. 10 CFR 50, Appendix B, Criterion XIII requires, in part, that "Measures shall be established to control the. . .storage. . .and preservation of material and equipment in accordance with work and inspection instruction to prevent damage or deterioration." Paragraph D.2.4.5.2 of the PSAR states, in part, "Material and equipment will be controlled and stored in accordance with established procedure."

Contrary to the above, the inspector determined that the hanger and restraint components stored outdoors (west of Warehouse No. 1) were not visually inspected as required by CECO Procedure LSOP 13-2, "Storage and Handling of Components," Revision 0, dated February 17, 1977. Further, there was no documented surveillance records for these components.