

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-265

Based on the inspection conducted on December 11-14, 1979, it appears that certain of your activities were in noncompliance with NRC requirements as noted below. These items are infractions.

1. Technical Specification 6.2.A requires that detailed written procedures including applicable checkoff lists be prepared, approved and adhered to for preventive and corrective maintenance operations which could have an effect on the safety of the facility.

Contrary to the above, on December 9, 1979, Temporary Procedure 1261, "Draining Unit 2 RHR Service Water Piping," was not adhered to in three instances as delineated below, resulting in an unplanned radioactive liquid effluent release to the Mississippi River as well as radioactively contaminating a small portion of the site grounds and the storm drainage system.

- a. The procedure required a hose be connected to one specified instrument line, whereas the hose was connected to the instrument manifold.
 - b. The procedure required draining the service water side of the RHR heat exchanger by opening one specified instrument line, whereas, all instrument lines connected to the manifold were opened.
 - c. The procedure required a hose be extended from the outside of the reactor building to the storm sewer, whereas, no such connection was made.
2. Technical Specification 6.2.B requires that radiation control procedures be maintained and adhered to.

Radiation Control Procedure QRP 100-1 titled "Radiation Control Standards" states in Paragraph F.16.A.2., "Except as noted, a Special Work Permit (SWP) will be required when personnel may, or are expected to, exceed a daily whole body dose of 50 millirems. If, however, a Radiation Protection man is in continuous attendance at the job site while a job is in progress, he may authorize a daily whole body dose of up to 100 millirem per day without requiring an SWP."

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Contrary to the above, two workers each received greater than 50 mrem dose (75 mrem and 130 mrem) on December 9, 1979, while performing work assignments at the instrument manifold near the 2B RHR Heat Exchanger and other locations without authorization provided by an SWP or continuous H.P. surveillance.

3. Technical Specification 3.8.D.1. states, "Radioactive liquids released from the facility shall be continuously monitored. To accomplish this, either the radiation monitor on the discharge line, or the discharge bay sampler shall be operable or grab samples shall be taken in the discharge bay during the course of the discharge."

Contrary to this requirement, the unplanned radioactive liquid release which began about 10:00 a.m. on December 9, 1979, while draining the 2B RHR Heat Exchanger via the instrument manifold was not continuously monitored.