

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison  
Company

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

Based on the inspection conducted on April 1-3, 1980, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. These items are infractions and are applicable to both Units 1 and 2.

1. 10 CFR 50, Appendix B, Criterion III, states, in part, that "Measures shall be established to assure that applicable . . . design basis . . . for those structures, systems, and components . . . are correctly translated into specifications, drawings, procedures, and instructions."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 9, dated July 16, 1979 states in Section 3 that "The fundamental vehicle for design control involves multi-level review and/or evaluation of design documents by individuals or groups other than the original designer or designer's immediate supervisor whose authority and responsibility are identified and controlled by written procedures. The design documents include, but are not limited to, system flow diagrams, design and construction specifications, load capacity data sheets, design reports, equipment specifications, process drawings."

Contrary to the above, design and acceptance criteria of CRD suspension systems had not been established for accomplishing calculations, completed calculations had not been reviewed by RCI, and design changes were not being interfaced between RCI and EES.

2. 10 CFR 50, Appendix B, Criterion V, states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings . . . and shall be accomplished in accordance with these instructions, procedures, or drawings."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 9, dated July 16, 1979, states in Section 5 that "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, specifications, or checklists. These documents will assist personnel in assuring that important activities have been performed. These documents will also reference applicable acceptance criteria which must be satisfied to assure that the quality related activity has been properly carried out."

Contrary to the above, procedures did not include provisions for formal review and approval of calculations, design information exchange, and designation of organizational authorities and responsibilities.

3. 10 CFR 50, Appendix B, Criterion XVIII, states, in part, that "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 9, dated July 16, 1979, states in Section 18 that "Audits will be performed by Commonwealth Edison Company and/or its contractors, subcontractors and vendors to verify the implementation and effectiveness of quality programs under their cognizance."

Contrary to the above, the licensee's audits of RCI were not comprehensive in that the fundamental design control deficiencies disclosed above had not been identified.