

NOTICE OF VIOLATION

Commonwealth Edison Company

Dockets No. 50-373; 50-374

As a result of the inspection conducted on July 24 through October 10, 1989, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1988), the following violations were identified:

1. 10 CFR 50.59(b)(1) requires that the licensee shall maintain records of changes in the facility made to the extent that these changes constitute changes in the facility as described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question. 10 CFR 50.59(a)(2) states, in part, that a proposed change shall be deemed to involve an unreviewed safety question if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased.

Contrary to the above, the written safety evaluation performed for modification M-1-1-84-019 failed to describe why the modification did not increase the consequences of failure of equipment important to safety, and failed to describe why the modification did not increase the probability of failure of equipment important to safety (i.e., the failure of the high pressure core spray (HPCS) system to perform its safety function due to the failure of relay N-86/1432 [bus is normal, with no overcurrent condition]).

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

2. 10 CFR Part 50, Appendix B, Criterion XI, requires, in part, that a test program shall be established to assure that all testing required to demonstrate that components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The Relay Setting Order set point sheet specified a time lever setting of 1.0L.

Contrary to the above, no testing was performed after installation of Type IAC 51 relay 2451-AP074B into its cabinet after calibration on November 22, 1988, to verify that the acceptance limits contained in the Relay Setting Order had been met, and as a result, on August 24, 1989, the relay was found to have a time lever setting of 3.0L.

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

3. 10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions,

procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, surveillance procedure LOS-DG-M3, Revision 19, was inappropriate to the circumstances in that it failed to provide an adequate surveillance for monitoring the motor driven fuel oil system pressure for the HPCS Diesel Generator to ensure proper functioning of the fuel pump, suction strainer, and fuel filter.

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

4. 10 CFR Part 50, Appendix B, Criterion XVI requires that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. Work requests L23569, L67556, and L67557 were issued to correct leaking pilot solenoid valves in the diesel generator air start system. An evaluation of these valve leaks performed on January 11, 1989, determined that they were caused by excessive line pressure.

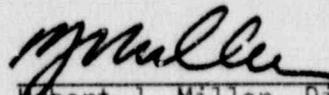
Contrary to the above, corrective actions had not been initiated to preclude repetition for the 2B diesel generator in that line pressures were observed to be 225 psig on the west pilot solenoid valve and 210 psig on the east pilot solenoid valve while the valves maximum rated pressure was 200 psig. The licensee's program to monitor line pressures weekly had not been implemented for the 2B diesel.

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 thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending the response time for good cause shown.

*November 20, 1989*

Dated



Robert J. Miller, Director  
Division of Reactor Safety