

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison
Company

Docket No. 50-373

Based on the inspection conducted January 30-31, and February 1, and 7-8, 1979, it appears that certain of your activities were in noncompliance with the NRC requirements as noted below. Items 1 and 2 are infractions and item 3 is a deficiency.

1. 10 CFR Part 50, Appendix B, Criterion V states, in part, 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." Quality Procedure 11-2 states in section 5.4 that, "Station staff under the direction of the Station Superintendent will operate equipment and systems in accordance with approved operating procedures and as required by the Preoperational or Startup test procedures." Startup Manual procedures LSU 500-1 and LSU 500-2 in sections F.1, F.7, F.9 and F.1 and F.2 respectively require, in part, that deviation from test procedures is not authorized, steps within a procedure segment may not be reordered unless done so with an approved procedure change and any time the deviation changes the intent of the test procedure, the deviation will be processed for test procedure change approval. Administrative Procedure LAP 900-4, Revision 6 and Construction Instruction 1-2-G-1 require in part, that when construction has progressed to the point where equipment being worked on could be livened from a source under the jurisdiction of the Generating Department, then the CECO supervisor in charge of the construction work must request that the OUT OF SERVICE cards be used in accordance with the above mentioned procedures.
 - a. Contrary to 10 CFR Part 50, Appendix B, Criterion V, Quality Procedure 11-2, and Startup Manual procedures LSU 500-1 and LSU 500-2 above, on October-13, 1978, the preoperational test (PT-AP-102) on the 250 VDC batteries was continued but the acceptance test was terminated without the licensee making an approved change to the procedure when the terminal voltage reached 217 volts instead of 210 volts as required by Step 10.3.B.h and the acceptance criteria.

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- b. Contrary to 10 CFR Part 50, Appendix B, Criterion V, Quality Procedure 11-2, Administrative Procedure LA 900-4, and Construction Instruction 1-2-G-1, on January 10, 1979, the licensee's contractor cut into RHR line 1RH26AA-4" to remove a spool piece without using the out of service procedures.
2. 10 CFR Part 50, Appendix B, Criterion XIV, states, in part, that, "Measures shall be established to indicate, by use of markings such as stamps, tags, labels, routing cards or other suitable means, the status of inspections and tests performed, These measures shall provide for the identification of items which have satisfactorily passed required inspections and tests, where necessary to preclude inadvertent bypassing of such inspections and tests." QA Manual Quality Requirement 14.0 states, "This system will also provide for indicating the quality or operating status during construction and plant operations. Marking, tags, labels, ... or other suitable means are used to identify, ... to preclude inadvertent bypassing of the inspections and tests required prior to their use."
- Contrary to the above, the licensee had not established a method to indicate the status of a system or part of a system after it has met the cleanliness tests performed to meet the requirement of the flushing procedures.
3. 10 CFR Part 50, Appendix B, Criterion XI, states, "A test program shall be established to assure that all testing required to demonstrate that structures, systems and 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." QA Manual Quality Requirement No. 11.0 states in section 11.2 that, "Written test procedures will be developed to demonstrate designs and performance characteristics as specified by design and operating requirements. The procedures will include, ... and state the data to be obtained and requirements and acceptance limits to be fulfilled."

Contrary to the above, Preoperational Test Procedure PT-AP-102 for DC Distribution did not provide for specific gravity corrections for changes in the electrolyte level as recommended in battery manufacturer's instruction manual, referenced in section 4.7 of the procedure.