

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

Docket No. 50-374

As a result of the inspection conducted on November 3-5, and 13-14, 1980 and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion II, states that, "The applicant shall establish at the earliest practicable time consistent with the schedule for accomplishing the activities, a quality assurance program..." and Criterion I, states that, "The applicant may delegate to others, such as contractors,... the work of establishing and executing the quality assurance program..., but shall retain responsibility therefore."

Commonwealth Edison Company Topical Report CE-1A, "Quality Assurance Program for Nuclear Generating Station," Revision 14, dated September 9, 1980, states in Section 2 that, "The quality assurance programs of Commonwealth Edison Company, Architect Engineers and Nuclear Steam Supply System vendors include the requirements of ASME Section III Article NCA-4000, the quality assurance criteria for nuclear power plants for Appendix B to 10 CFR 50 "Quality Assurance Criteria for Nuclear Power Plant," and the mandatory requirements of ANSI N45.2, "Quality Assurance Program Requirements for Nuclear Power Plants" and ANSI N18.7, "Standards for Administrative Control for Nuclear Power Plants." The requirements are implemented by means of detailed quality procedures delineating the means of detailed quality procedures delineating the specific methodology to be used. In addition, individual contractor's, fabricator's and vendor's Quality Assurance programs will include the applicable portions of the Code. Standards and Appendix B as they affect the total program."

Contrary to the above, Reactor Control, Inc., (designer and installer of portions of the Control Rod Drive System) did not have a QA/QC program that addressed the areas of organization interfaces, design control, and document control. In addition, the program also lacked detailed implementing procedures for design, installation, and inspection activities.

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

2. 10 CFR 50, Appendix B, Criterion XVIII, states 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."

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Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 14, dated September 9, 1980, 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" and "Audits will be performed selectively at various stages of contracts on a varying frequency, based on the nature and safety significance of the work being done to verify compliance and determine the effectiveness of procedures, inspections, tests, process controls and documentation."

Contrary to the above, audits of Reactor Controls, Inc., appeared to be inadequate in that there was no systematic evaluation of contractor performance and audit findings were not resolved in a timely manner.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within twenty-five days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

January 7, 1981
Dated

James G. Keppler
James G. Keppler
Director