

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

Docket No. 50-374

Based on the inspection conducted on August 6-8, 1980, it appears that certain of your activities were not conducted in conformance with NRC requirements, as noted below. These items are infractions.

1. 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, the MCCo small bore hanger inspection and preliminary design work was being conducted without approved procedures. Furthermore, the MCCo organizational structure and the personnel responsibility were not formally established.

2. 10 CFR 50, Appendix B, Criterion II, states, in part, that "The applicant shall establish at the earliest practicable time, consistent with the schedule for accomplishing the activities, a quality assurance program . . . The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 9, dated July 16, 1979, states in Section 2 that "Training will be conducted in a time frame adequate to prepare personnel for their job responsibilities" and "Retraining sessions will be scheduled to assure that adequate skills are maintained for qualified and/or certified personnel."

Contrary to the above, contractor personnel hired by MCCo to perform small bore hanger preliminary design activities had not been formally indoctrinated and trained.

3. 10 CFR 50, Appendix B, Criterion VI requires, in part, that "Measures shall be established to control the issuance of documents such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 9, dated July 16, 1979, states in Section 6 that "A document control system will be used to assure that documents such as specifications, procedures, and drawings are reviewed for adequacy and approved for release by authorized personnel. Such documents will be distributed to and used at the locations where the prescribed activity is performed. Changes to these documents will be handled similarly and will be reviewed and approved by the same organization that performed the original review and approval, unless delegated by the originating organization to another responsible organization."

Contrary to the above, MCCo and S&L Department Correspondence and Inter-Office Memorandums were being issued in lieu of approved procedures for small bore pipe hanger work activities. These documents had not been issued, reviewed, and approved in accordance with QA requirements. Several MCCo calculations had not been documented and MCCo Form System did not conform with QA program requirements.

4. 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, and process drawings."

Contrary to the above, the S&L staff at the site was using non-safety related criteria for the design of safety related small bore hangers. Design parameters, including bending and torsional movements, support weight, and overall structural deflections were not being taken into consideration.

5. 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 audit and surveillance of small bore pipe hanger activities was not being carried out to verify compliance with the QA program.