Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company Docket No. 50-373

Based on the inspection conducted May 20-23, 27-30, June 3-6, 10-13, 1980, it appears that certain of your activities were in noncompliance with NRC requirements as noted below. All the items are infractions.

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 Procedure LSU 100-2, Step F.1.e., requires that Station Construction and Site QA make a detailed verification of all items in the System and Equipment list for completeness and conformance to specifications and Deficiency Reports be prepared for all deficient conditions.

   Startup Manual Procedure LSU 100-2, Step F.1.J.(4), requires that to be acceptable the turnover package shall contain a record, by location and purpose, of all jumpers, lifted wires and relay blocks that cannot be removed at turnover time.

   Startup Manual Procedure LSU 100-5, Step F.2.c, states that when a system is released for preoperational testing the Test Engineer is responsible for ensuring that blue preoperational blue tags and/or labels are properly applied throughout the system. Step F.2.d. requires that when a system, or part of it, is returned to Station Construction under a Temporary Turnover Agreement the tags and/or labels on the returned components be removed by the department which placed them and the appropriate tags/labels be affixed by the Station Construction Department to indicate the equipment's new status.

   Startup Manual Procedure LSU 400-1, Step F.1, requires that preoperational test procedures conform to the format and content specified in Attachment A of LSU 400-1. Attachment A, Paragraph 8, states that all of the special tools or calibrated test instruments required for performing the test be listed under Section 8, "Test Equipment," by description, model and serial number, and verification of proper calibration.

Startup Manual Procedure LSU 500-2, Step F.2, requires that procedure changes that change the intent of the test procedure be processed using the Test Procedure Change Approval Form in Attachment C of LSU 500-2, which requires the approval of the Station Nuclear Engineering Department.

a. Contrary to 10 CFR 50, Appendix B, Criterion V, Quality Procedure 11-2, and Startup Manual Procedure LSU 100-2 a Deficiency Report to cover a deficiency identified in Nonconformance Report No. 374 was not prepared prior to the turnover for PT-MS-101A, on May 2, 1980.

b. Contrary to 10 CFR 50, Appendix B, Criterion V, Quality Procedure 11-2, and Startup Manual Procedure LSU 100-5 several components turned over for preoperational testing in the diesel generator systems were missing the blue preoperational tag and/or label, while others under a temporary turnover agreement had not been retagged by Station Construction to indicate the equipment's new status.

c. Contrary to 10 CFR 50, Appendix B, Criterion V, Quality Procedure 11-2, and Startup Manual Procedure LSU 400-1 during the performance of PT-PV-101, February, 1980, the vibration instrumentation being used to monitor vessel internals had not been listed as required in Section 8 of the Test Procedure.

d. Contrary to 10 CFR 50, Appendix B, Criterion V, Quality Procedure 11-2, and Startup Manual Procedure LSU 100-2 the turnover package for emergency diesel generator 0 dated April 17, 1979, did not identify jumpers installed in panel ODG 025B, terminal board 18 between terminals 54 and 84 and between terminals 50 and 82.

2. 10 CFR Part 50, Appendix B, Criterion XI, states, in part, that "Test results shall be documented and evaluated to assure that test requirements have been satisfied." Quality Procedure 11-2 states in Section 5.5 that test documentation shall include any deviation from the planned test procedure. Quality Procedure 11-1 states in Section 4.3 that data sheets will be used to collect, store, and present results of construction tests.

a. Contrary to 10 CFR 50, Appendix B, Criterion XI, and Q.P. No. 11-2, the licensee failed to document the use of a clamp-on ammeter and results achieved during the testing of an immersion heater on diesel generator 1A.

b. Contrary to 10 CFR Part 50, Appendix B, Criterion XI, and Q.P. No. 11-1 the licensee failed to document the performance and results of an air blow performed on the air starting systems of the emergency diesel generators.

3. 10 CFR Part 50, Appendix B, Criterion VI, states, in part, that "Measures shall be established to control the issuance of documents such as instructions, procedures and drawings including changes thereto.... These measures shall assure that documents.....are reviewed....and approved for release by authorized personnel...." QA Manual Q.R. No. 6.0, Section 6.1, requires that controls be used to assure that documents such as procedures and drawings are reviewed and approved for release by authorized personnel and requires that as-built drawings be kept updated, properly maintained and controlled. Quality Assurance Procedure Q.P.No. 11-2 designates the Station Nuclear Engineering Manager and Project Engineer as the authorized personnel for review and approval of preoperational test procedures.

a. Contrary to 10 CFR 50, Appendix B, Criterion VI, Q.R. No. 6.0, and Q.P. No. 11-2, the licensee only reviewed the references to the documents used to perform six of ten major tests identified in Table 14.2-20 of the FSAR for test procedure PT-VG-101 for the Standby Gas Treatment System.

b. Contrary to 10 CFR 50, Appendix B, Criterion VI, and Q.R. No. 6.0, as-built drawings for emergency diesel generator 1B control panel do not agree with the actual wiring on the terminal boards as follows:

(1) Terminal board 14, terminal 26 has 4 wires terminating at this point. Drawing IE 14683AG indicates 3 wires connected to terminal number 26.

(2) Terminal board 13, terminal 8 has 4 wires terminating at this point. Drawing IE 14683AG indicates 3 wires connected to terminal number 8.

(3) Terminal board 9, terminal 10 has 2 wires terminating at this point. Drawing IE 14683AE indicates 1 wire connected to terminal No. 8.