

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-456

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Based on the inspection conducted on September 22-25, 1980, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. All items are infractions and are applicable to both Units 1 and 2.

1. 10 CFR 50, Appendix B, Criterion XVI, states in part, that "Measures shall be established to assure conditions adverse to quality such as...and nonconformances are properly 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".

Paragraph 4 in Section 16 of Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program", Revision 9, dated July 16, 1979, states in part, "Implementation of corrective action will be accomplished at the source of deficiency by contractor personnel as directed by cognizant Edison engineers".

Contrary to the above, it was determined that even though the ends of several cables were found to be open during various surveillances over a period of two months, the cause of the condition was not determined and corrective action was not taken to preclude repetition. On September 22, 1980, it was identified that several cables were supplied by the vendor with one end open, which was contrary to the purchase specifications for cables; no attempt was made to remove the wrappers on the cable reels to investigate the cause of recurring nonconforming conditions. Furthermore, the corrective action taken to seal those cable ends which were open was not documented in the Inspection Correction Reports. The cables in question are stored outdoors and may not be used for an extended period; the moisture, absorption, when the ends of cables are open during inclement weather conditions, could deteriorate the insulation over an extended period.

2. 10 CFR 50, Appendix B, Criterion VII, states, in part "Measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractor or subcontractor, conform to the procurement documents. These measures shall include provisions, as appropriate, for...examination of products upon delivery".

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 9, dated July 16, 1979, states in paragraph 7.4, "Materials and Articles received from vendors will be inspected upon receipt to assure physical integrity and identity plus documentation compliance with procurement requirements".

The following examples were contrary to the above:

- a. The inspector determined that even though safety related HVAC ducts supplied by Pullman Construction Industries did not meet the Specification and American Welding Society (AWS) D1.1 criteria the components were released for shipment by the vendor as acceptable equipment and receipt inspection at the site accepted the same.
 - b. Main Control Board panels were receipt inspected and accepted even though the welds inside them do not meet the acceptance criteria specified in the Specification and AWS D.1.1 Code.
 - c. Supports for Hanger H-81, which were supplied by Systems Control, were received, accepted by receipt inspection, and installed even though the support had 1/8" size welds instead of the 1/4" size welds specified.
3. 10 CFR 50, Appendix B, Criterion XIII, states in part, "Measures shall be established to control the handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration".

BM-103, "Site Storage Instructions", under paragraph "Responsibilities", states that "QA supervisor is responsible for assuring that surveillance of storage is performed by Field Engineer and that storage is in accordance with procedures and intent of ANSI N45.2.2".

Contrary to the above, it was determined that safety related HVAC ducts were being stored off cribbing on the ground, and were immersed in a pool of accumulated rainwater.