

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison  
Company

Docket No. 50-254  
Docket No. 50-265

As a result of the inspection conducted on February 23-27, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. Technical Specification 6.2.A.11 states:

"Detailed written procedures . . . shall be prepared . . . and adhered to . . . fire protection program implementation."

Maintenance Procedure QMP 100-3, Fire Prevention for Welding and Cutting, paragraph F.1.a states:

"Areas where . . . welding . . . shall be kept clean and all accumulation of trash, rags, etc. shall be removed."

Paragraph F.1.b states:

"All . . . cable in trays . . . subject to damage or ignition . . . shall be covered with suitable noncombustible materials."

Paragraph F.3.a states:

"One or more individuals in each work area shall be designated to watch for potential fire or smoldering . . ."

Contrary to the above, the inspector observed a contractor welder on February 26, 1981 in the Unit 2 Cable Tunnel performing welding operations above safety related cabling without a fire watch in the immediate area. Trays of safety related cabling were not covered with suitable noncombustible materials and were being exposed to potential damage or ignition and combustible materials (wood, cardboard, paper, and plastic) had accumulated in the immediate area of the welding operations. Unit 2 was operating at 100% at the time of this observation.

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

2. Technical Specification 3.12.F.1 states:

"All penetration fire barriers protecting safety related areas shall be intact except as stated in Specification 3.12.F.2."

Technical Specification 3.12.F.2 states:

"With one or more penetration fire barriers not intact, establish a continuous fire watch on at least one side of the affected penetration within one hour if the area on either side of the affected penetration contains equipment required to be operable."

Contrary to the above, the inspector observed an open fire barrier penetration above the fire door between the Unit 1 and Unit 2 Reactor Buildings on the 595' level with no apparent fire watch.

This is a Severity Level V violation (Supplement I).

3. Technical Specification 6.2.A.11 states:

"Detailed written procedures . . . shall be prepared . . . and adhered to . . . fire protection program implementation."

Administrative Procedure QAP 200-13, Station Housekeeping Organization, paragraph C.3 states:

"The working department or support group is responsible for returning all areas affected by their work to normal acceptable cleanliness when work is finished. This includes:

- a. Removing all combustible material and debris from the work area.
- b. Returning excess material and equipment to the normal storage area.
- c. Removing all tools, equipment and material from the area when the job is complete."

Contrary to the above, the inspector observed accumulations of combustible material in safety related areas including the auxiliary electric equipment room, the cable tunnels and the 1/2 diesel generator room which were indicative of failure to adhere to the above procedure.

This is a Severity Level V violation (Supplement I).

4. Technical Specification 6.2.B states:

"Radiation control procedures shall be maintained . . . and adhered to."

Radiation Protection Procedure QRP 100-1, Radiation Control Standards, paragraph 15.C.6.e states:

"Do not eat, smoke, drink, or chew in controlled areas."

The licensee has defined the Unit I and Unit II cable tunnels as controlled areas.

Contrary to the above, the inspector observed many cigarette butts scattered throughout the Unit 1 and Unit 2 cable tunnels and an empty beer can in the Unit 1 cable tunnel.

This is a Severity Level V violation (Supplement I).

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.

Dated

4/3/81

*R. L. Norenius for*  
C. E. Norenius, Acting Director  
Division of Engineering and  
Technical Inspection