

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

As a result of the inspection conducted on January 26-29, February 2-6, 18-20, 23, and March 6, 1981, 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 XII requires in part, that measures be established to assure that tools, gauges, instruments and other measuring and testing devices used in activities affecting quality are properly calibrated at specified periods to maintain accuracy within necessary limits. The Quality Assurance Program, Quality Requirement 12.0, Section 12.1, states in part, "Measuring and test equipment which is used...to perform the preoperational testing... will be periodically calibrated or adjusted to assure that accuracy is maintained within necessary limits in order to verify design requirements."

Contrary to the above, CRD scram timing was performed during January 1981, using an uncalibrated device.

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

2. 10 CFR 50, Appendix B, Criterion II requires in part, that activities affecting quality be accomplished under suitable controlled conditions, such as adequate cleanliness. 10 CFR 50, Appendix B, Criterion XIII requires, in part, that measures be established to control the storage and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration.

The Quality Assurance Program, Quality Requirement QR2.0, contains a Commonwealth Edison Company commitment to the regulatory positions of Regulatory Guide 1.38, Revision 2, and Regulatory Guide 1.39, Revision 2. The regulatory positions of Regulatory Guides 1.38, Revision 2 and 1.39, Revision 2, endorses the requirements of ANSI N45.2.2-1972 and N45.2.3-1973 respectively. ANSI N45.2.2-1972, Section 6.2, states, in part, that, "Cleanliness and good housekeeping practices shall be enforced at all times in the storage areas. The storage areas shall be cleaned as required to avoid the accumulation of trash, discarded

packaging materials and other detrimental soil. The use or storage of food, drinks...in any storage area shall not be permitted...Periodic inspections shall be performed to assure that storage areas are being maintained." Section 6.5 states, in part, that, "Items released from storage and placed in their final locations within the power plant, shall be...cared for in accordance with the requirements of Section 6 of this standard." ANSI N45.2.3-1973 requires in part that control of all tools, equipment, materials and supplies be maintained to prevent the inadvertent inclusion of deleterious materials or objects in critical systems.

Contrary to the above, the licensee does not have a program to maintain adequate cleanliness as evidenced by the following items noted during a plant tour on February 20, 1981:

- a. Milk containers were found inside the 1A diesel generator control cabinet and on safety related cables of an ESF Division 2 cable tray.
- b. Cloth hat, mask filter, plywood, and other trash were found inside the 1A diesel generator control cabinet and/or behind control room panels.
- c. Instrument panels for the HPCS, LPCS and RCIC had not been properly protected and as a result instrumentation had been sprayed with water or a slurry of water and concrete. In addition cardboard, wood, etc. was being stored against, behind, or on top of such cabinets.
- d. A weld rod oven and a welding power supply box were laying on safety cables of ESF Division 2.

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

The inspection showed that action had been taken to correct the identified items of noncompliance and to prevent recurrence. Consequently, no reply to these items of noncompliance is required and we have no further questions regarding this matter.

JUN 01 1981

Dated \_\_\_\_\_

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