

## NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373  
Docket No. 50-374

As a result of the inspection conducted from October 24 through December 7, 1989, and in accordance with 10 CFR Part 2, Appendix A - General Statement of Policy and Procedure for NRC Enforcement Actions (1989), the following violation was identified:

Technical Specification 6.2.A states, in part:

Detailed written procedures including applicable checkoff lists covering items listed below shall be prepared, approved and adhered to:

- ° The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 which includes administrative, surveillance and operational procedures.
- ° Preventive and corrective maintenance operations.
- a. Operating Procedure LOP-DC-05, 125V DC System, Division 2 Ground Location and Isolation, provides for a specific sequence to be followed when attempting to locate a ground.

Contrary to the above, on October 20, 1989, while searching for a ground in the 125V DC System on Unit 1, the Shift Engineer failed to follow procedure LOP-DC-05 which caused a primary containment isolation system isolation and standby gas treatment automatic start (No. 373/89023-01a; No. 374/89022-01a).

- b. Procedure LTS 100-19, Reactor Water Clean Up Suction Local Leak Rate Test 1(2)G33-F001 and 1(2)G33-F004, step F.2.b requires that valve 1G33-F103, RWCU Suction from Reactor Vessel Bottom Bypass Stop, be closed. Step F.4 directs the opening of 1G33-F001.

Contrary to the above, on November 7, 1989, while preparing to perform the local leak rate test on valve 1G33-F004, the Unit 1 operator opened valve 1G33-F001 prior to valve 1G33-F103 being closed. This is a violation of procedure LTS-100-19, step F.2.b (No. 373/89023-01b).

- c. Administrative Procedure LAP 900-28, Erection, Inspection and Use of Scaffolding and Ladders provides numerous requirements for the erection of scaffolding.

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Contrary to the above, during the inspection period, several scaffolds in the control room and the drywell (in the vicinity of safety-related equipment) were noted as not containing adequate toeboards, not having plumb vertical support members, lack of crossbracing, and not adequately braced/tied off. This is a violation of Administrative Procedure LAP-900-28, (No. 373/89023-01c; No. 374/89022-01b).

- d. Administrative Procedure LAP 100-11, LaSalle County Station General Surveillance Program, step F.1.e requires that the surveillance coordinator verify that the data has been entered correctly.

Contrary to the above, on July 18, 1989, the surveillance coordinator had failed to verify that all of the data that had been entered was correct and an incorrect code resulted in a missed surveillance. This is in violation of Administrative Procedure LAP-100-11, step F.1.e (No. 373/89023-01d; No. 374/89022-01c).

- e. Instrument surveillance procedure LIS-NB-111, Unit 1 Reactor High Pressure Shutdown Cooling Isolation Calibration, step F.3.A requires that if the shutdown cooling mode is required to be in operation the operator is required to de-energize the breakers for the RHR Shutdown Cooling Outboard Suction Isolation Valve 1E12-F008.

Contrary to the above, on December 4, 1989, while performing the high reactor pressure isolation calibration for shutdown cooling the Unit 1 operator through poor communications with the instrument mechanic, energized the breaker controlling 1E12-F008 instead of deenergizing it. This is a violation of Surveillance Procedure LIS-NB-111, step F.3.A (No. 373/89023-01e).

- f. Maintenance procedure LMP-MS-06, Installation/Removal of Main Steam Safety Valves, step F.2.13.1, requires that four bolts and nuts be installed and evenly tightened at 90 degree intervals around a blind flange that is installed when an SRV is removed.

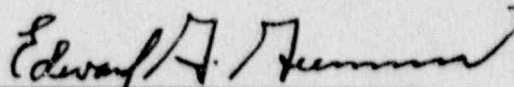
Contrary to the above, on November 2, 1989, after removing a safety relief valve on Unit 1 the maintenance mechanics failed to install the correct number of bolts on a blind flange cover for an opening in the main steam line, resulting in a significant primary water leak in the drywell when the reactor water level was flooded up to the steam lines. This is a violation of Maintenance Procedure LMP-MS-06, step F.2.13.1 (No. 373/89023-01f).

Together these examples of failure to adhere to procedures are considered a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

JAN 10 1990

Dated \_\_\_\_\_



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Edward G. Greenman, Director  
Division of Reactor Projects