

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

Docket No. 50-374

As a result of the inspection conducted at LaSalle on April 6-10, April 13-17, April 27 through May 1, and May 26-29, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified. Item 3 is applicable only to Unit 2. The remainder apply only to Unit 1.

1. 10 CFR 50, Appendix B, Criteria XV, states in part, "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation."

Commonwealth Edison Company states in their Quality Assurance Program Topical Report CE-1-A, Revision 15, Section 14, that controls will exist consisting of documented receipt inspections and item tagging to indicate nonconforming status, with such hold and reject tags only being removed at the direction of Quality Assurance personnel.

Contrary to the above, a dial indicator, I.D. M5069, placed on hold by Quality Control on February 25, 1981, was taken off hold and released for usage by the Mechanical Maintenance Department, without a receipt inspection being done and without the hold status being removed by Quality Assurance personnel.

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

2. 10 CFR 50, Appendix B, Criteria II, states in part, "The applicant shall establish at the earliest practical time, consistent with the schedule for accomplishing the activities, a quality assurance program which complies with the requirements of this appendix. This program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with these policies, procedures, or instructions."

Commonwealth Edison Company states in part in their Quality Assurance Program Topical Report CE-1-A, Revision 15, Section 2, "Certification records will be maintained by the Quality Assurance Department as well as the department wherein the employee performs his activities.

Qualification and certifications will be maintained in a current status and will be established to meet the applicable requirements of ASME Code and ANSI Standard N45.2.6." Additionally, Section 2, commits to ANSI N18.7-1976 which endorses ANSI N45.2.6-1973 in Paragraph 5.2.7.

Contrary to the above, Quality Control personnel, who are performing receipt inspections, do not have documented certifications required by ANSI N45.2.6-1973, Paragraph 2.2.4.

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

3. 10 CFR 50, Appendix B, Criterion V states, "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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

The Station Quality Assurance Manual states, in part, that the Maintenance Assistant Superintendent or the Master Mechanic shall review each Work Request and direct their staff to prepare a Maintenance/Modification Procedure, Figure 9 of the Station QA Manual, as applicable, which together with the Work Request and all other documentation constitute the Maintenance/Modification work package.

Quality Procedure 3-52 states, in part, that the Maintenance Assistant Superintendent or Master Mechanic shall have prepared and approved Maintenance/Modification Procedure for safety, code and plant reliability related maintenance.

LAP-1300-1 states, in part, that the Maintenance Assistant Superintendent shall sign and date the Maintenance/Modification Procedure cover sheet for maintenance procedures which have not been previously approved by onsite review.

Contrary to the above, repairs were made to Unit 2 Diesel Generator A on April 10, under Work Request L08505 without the use of an approved procedure.

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

4. 10 CFR 50, Appendix B, Criterion XVI states, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly 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. The identification of the significant condition adverse to quality,

the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management."

QP 11-2 states that when in preoperational testing it becomes necessary to rework equipment, the action will be accomplished in accordance with controlled procedures and a table of apparent deficiencies will be documented.

LSU 200-2 states that any deficient condition encountered prior to the completion of preoperational testing will be added to the deficiency list and will be processed according to Step 3 and Attachment A.

Contrary to the above, during the conduct of Preoperational Test PT-DG-201A a deficiency where lockout relays 86D60, 86D61A and 82D62A of Diesel Generators 0, 1A and 2A differed in their as-built condition and also did not agree with their respective schematic diagrams IE-0-4412AH, IE-1-4009AH and IE-2-4009AH was identified on October 16, 1980 and a Deficiency Report was not written.

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

5. 10 CFR 50, Appendix B, Criterion XVII, states in part, "Consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention, such as duration, location, and assigned responsibility."

Commonwealth Edison Company has committed to the requirements and guidelines of ANSI N45.2.9-1974 through Regulatory Guide 1.88 (Revision 2) as stated in the Quality Assurance Program Topical Report CE-1-A, Revision 15. Page B.1-108 of Appendix B to the LSCS FSAR states, "The station fire protection afforded the record's storage area conforms to NFPA 232 criteria...and "We comply with the objectives set forth in the referenced revision of this regulatory guide." (R.G. 1.88, Revision 2, October, 1976).

ANSI N45.2.9 states, "Permanent and temporary record storage facilities shall be constructed or located as to protect contents from possible destruction by causes such as fire.."

Contrary to the above:

- A. Quality Assurance records were stored in a non-fire rated room in the basement of the Service Building for periods up to six months.
- B. The Central File room in the Service Building does not conform to the fire protection criteria of NFPA-232, 1975 edition in that:

- (1) Walls are non-fire rated.
- (2) Doors are non-fire rated.
- (3) Walls do not extend to the true ceiling.

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

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 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. Consideration may be given to extending your response time for good cause shown.

The inspection showed that action had been taken to correct the noncompliance identified as Item No. 1 (one) and to prevent recurrence. Consequently, no reply to this item of noncompliance is required and we have no further questions regarding this matter.

7/7/81  
Dated

C. E. Norelius  
C. E. Norelius, Acting Director  
Division of Engineering and  
Technical Inspection Branch