

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket Nos. 50-237; 50-249

Docket Nos. 50-254; 50-265

As a result of the inspection conducted on August 25, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified:

10 CFR 50, Appendix B, Criterion XVIII, states, in part, that "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 20, dated February 17, 1982, states in Section 18 that, "Audits will be performed by Commonwealth Edison Company and/or its contractors, subcontractors and vendors to verify the implementation and effectiveness of quality programs under their cognizance."

Commonwealth Edison Company QA Manual, Quality Procedure No. 18-1, "Quality Program Audits," Revision 8, dated July 10, 1981, states in Section 5.2 that, "The selection of off-site facilities to be audited and the frequency of audits will be based on Contractor Capability Evaluation, CECO Construction Surveillance Reports or findings from previous audit reports. Audits may be performed on offsite contractors that are selected on an irregular basis without regard to previous Capability Evaluation or audit reports. The frequency will be based on the nature and safety significance of the work being performed. Generally, audits will be scheduled where practical to coincide with plant visits involving witnessing inspection notification points. Audits of the Nuclear Steam Supply vendor, the Architect-Engineer and Station Nuclear Engineering Department will be conducted in approximate annual basis."

Contrary to the above, the QA/design audit program to ensure contractor program implementation was deficient, in that: (1) there had been no implementation QA audits or surveillances conducted from CY 1977 to CY 1979 at Nutech; and (2) deficiencies existed in the Nutech QA audit program that had gone undetected.

This is a Severity Level V 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. Consideration may be given to extending your response time for good cause shown.

Oct 22, 1982

Dated

W. S. Little lsj

W. S. Little, Chief
Engineering Programs Branch