

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

As a result of the inspection conducted on June 29, 1981 through August 28, 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 XI, requires that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The QA Manual, Quality Requirement 11.0, Section 11.2 states that construction testing consists of onsite component testing such as hydrostatic testing, pressure proof testing, pump and valve testing, actuation to verify proper installation and electrical continuity verification. Written procedures or checklists will be employed and the status of equipment both before and after testing will be documented.

Contrary to the above, the inspector determined that pressure proof testing of the Secondary Containment was conducted during the weekend of July 18-19, 1981 without an approved procedure as required. The failure to have and follow procedures as required resulted in damage to the Secondary Containment roof structure.

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

2. 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 ". . . . good housekeeping practices shall be enforced at all times in the storage areas.

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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. Commonwealth Edison Company, LaSalle Station, Housekeeping Procedure, Project Procedure 81-2, Part 6.3.7 states: "Equipment and systems in areas where construction activities are performed shall be properly protected."

Contrary to the above, the licensee did not adequately protect equipment as evidenced by the following items noted during plant tours:

- a. A welding power supply (energized) setting in an ESF divisional open cable tray, noted on July 13, 1981.
- b. Men welding and grinding above and in the vicinity of ESF divisional open cable trays without protection for the cables, noted on July 13, 1981 and on July 29, 1981.

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.

Dated OCT 2 - 1981

R. L. Spessard, Director
Division of Resident & Project
Inspection