Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

As a result of the inspection conducted on January 4, 1982 through February 5, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

10 CFR Part 50, Appendix B, Criterion V, states, in part, that "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."

10 CFR 50 Appendix B, Criterion XIV, requires measures to be established to indicate the operating status of systems and components, such as by tagging valves, to prevent inadvertent operation.

Quality Procedure 11-2 states in Section 5.4 that "Station staff under the direction of the Station Superintendent will operate equipment and systems in accordance with approved operating procedures and as required by the Preoperational or Startup test procedures."

Quality Requirement 14.0 states in Section 14.3 "STATUS CONTROL" that "methods of control will be provided through construction and Station Operating Procedures which describe the use of forms, tags, and logging methods."

Station procedure LAP 240-3, Electrical Jumper and Relay Block and Lifted Electrical Leads, establishes the administrative controls necessary for the installation and removal of electrical leads and jumpers. The Shift Engineer has the daily responsibility to verify the installation or removal and document these actions with appropriate master log entries.

Station procedure LAP 820-5 states that the status of system valves shall be verified using mechanical checklists.

Contrary to the above:

a. On December 5, 1981, during an instrument line hydrostatic test, valve 1B21 F371, which was tagged out-of-service in the closed position, was in fact not closed.

- b. On December 6, 1981, valve 1DG032, which is in the cooling water line to the Low Pressure Core Spray (LPCS) pump, was found closed. The mechanical checklist, LOP-DG-08M, requires the valve to be open (listed as "locked open"). This resulted in the LPCS pump running without cooling water, which contributed to the running of the LPSC pump while temperatures were above the alarm limits.
- c. On December 6, 1981, LPCS pump temperature thermocouple leads were found to have been determinated without any authorizing documentation and without operations department knowledge. This contributed to the LPCS pump being run while temperatures were above alarm limits.

The examples cited as part of this noncompliance are regarded as repetitive of examples cited in noncompliance (373/80-36-01, jumper log problems) and (373/81-06-02, out-of-service boundary problems).

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

Pursuant to the provisions of 10 CTR 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 MAR 9 1982

R. L. Spessard, Director Division of Project and Resident Programs