

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-237

Docket No. 50-249

As a result of the inspection conducted on May 7 through June 4, 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 II states, in part, "The applicant shall establish...a quality assurance program... This program shall be documented by written polices, procedures, or instructions and shall be carried out throughout plant life in accordance with those polices, procedures, or instruction."

Commonwealth Edison Quality Assurance Manual, Quality Requirement 2.0, Section 2.2 Policy states, "Also, Commonwealth Edison commits to comply... with the Regulatory position of the following Regulatory Guides..."
"Dresden, Quad-Cities and Zion Nuclear Power Stations...1.33 (Safety Guide 33 - November 1972)."

Safety Guide 33 - November 1972, Appendix A, Section I.5 requires General Procedures for the control of maintenance, repair, replacement, and modification work. Sub Item b. requires that factors be taken into account in preparing detailed work procedures including the necessity for minimizing radiation exposure to workmen. Section J states, "Chemical and radiochemical control procedures should be written to prescribe the nature and frequency of sampling and analysis, instructions maintaining water quality within prescribed limits and limitations on concentrations of agents that may cause corrosive attack or fouling of heat transfer surfaces, or that may become sources of radiation hazards due to activation.

Dresden Administrative Procedure DAP 3-7 "General Use Hose Identification" specifies appropriate uses for hoses in the plant by color codes and if it is contaminated or uncontaminated as follows:

- Green hoses - Air or Water - Clean inside and outside
- Red hoses - Air only - Contaminated outside (clean inside)
- Black hoses - Water only - Contaminated outside and inside

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Contrary to the above, on several plant tours throughout the inspection period, the Senior Resident Inspector identified numerous instances where hoses were left or in use without regard for the color code that could result in contaminating a clean system or could have resulted in an individual using a hose with internal contamination for a supplied air breathing system. Examples are: on May 11, 1982, red and black hoses lying open on the noncontaminated Unit 2/3 refuel floor; on May 19, 1982, two red hoses on the Unit 2/3 refuel floor being used for contaminated demineralized water; and on May 27, 1982, a combination of green and black hoses connected together being used for service air.

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

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.

Dated

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