

Appendix

NOTICE OF VIOLATION

Comonwealth Edison Company

Docket No. 50-249

As a result of the inspection conducted on April 20, 22-25, and May 20 and 21, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 50, Appendix J requires that all Type A tests shall be conducted in accordance with the provisions of ANSI N45.4-1972. ANSI N45.4-1972 requires a leakage rate test period of 24 hours unless it can be demonstrated to the satisfaction of those responsible for the acceptance of the containment structure that the leakage rate can be accurately determined during a shorter term period. BN-TOP-1, Revision 1, dated November 1, 1972 (Bechtel's Corporation Topical Report) is the only short-term duration, general test method, which has received NRC's approval. BN-TOP-1, Revision 1 requires that the data analysis be based on the total time calculations based on the ANSI N45.4 formulas.

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed and accomplished in accordance with documented procedures which include appropriate quantitative or qualitative acceptance criteria for determining that the activities have been satisfactorily accomplished.

Contrary to the above, on April 24, 1982, the licensee was ready to terminate the leakage rate data acquisition phase and start the verification phase after approximately six hours of data acquisition, based on the mass plot calculations which are not in accordance with ANSI N45.4-1972 paragraph 7.9, and BN-TOP-1, Revision 1, Section 6. Before the start of the test, the licensee was aware that in order to perform a short duration ILRT he had to calculate the leakage rate based on the total time equations of ANSI N45.4 and BN-TOP-1.

In addition, test procedure DTS 1600-7, Revision 4 was inadequate in that it failed to address the requirements for performing a short-term duration CILRT, and personnel performing the test were not properly indoctrinated and trained to assure proficiency in the performance of short-term duration CILRT.

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

2. 10 CFR 50, Appendix B, Criterion XII requires that instruments and other testing devices used in activities affecting quality be properly controlled, calibrated and adjusted at specified periods to maintain

accuracy within necessary limits. Criterion XVII requires that sufficient records be maintained to furnish evidence of activities affecting safety. The records shall include qualification of equipment.

Contrary to the above, calibration records for the flowmeter used during the verification phase of the leakage rate test were not available at the site while the flowmeter was being used.

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

3. Technical Specification 6.2.A states that detailed written procedures addressing surveillance and testing requirements shall be prepared, approved, and adhered to. Station procedure DTS 1600-7, Revision 4, required that valve MO-3-1402-25A be in the closed position and valves SO-3-2301-29 and SO-3-2301-30 be in the open position during the performance of the ILRT.

Contrary to the above, three valves, MO-3-1402-25A, SO-3-2301-29, and SO-3-2301-30, were found in positions other than those specified by the procedure.

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

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.

JUL 29 1982

Dated _____

Original signed by C.E. Norelius

C. E. Norelius, Director
Division of Engineering and
Technical Programs