

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

As a result of the inspection conducted on June 1-30, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. Paragraph 2.C.(2) of facility operating license NPF-11 states in part that, "The licensee shall operate the facility in accordance with the Technical Specifications..."

Contrary to the above requirement, the following items represent a failure on the part of the licensee to properly implement Technical Specification requirements:

- a. On April 19, 1982, the channel check requirements for the Reactor Building and Fuel Pool Vent Exhaust Monitoring System contained in Technical Specification 4.3.2.1 were not performed.
- b. During the period April 18-28, 1982, the surveillance requirements of Technical Specification 4.3.7.11 were not satisfied for the Station Vent Stack Radiation Monitor System.
- c. During the period May 1-3, 1982, action statement requirements of Technical Specification 3.3.7.11 for an inoperable station vent stack flow recorder were not satisfied.
- d. During the period April 17, 1982-May 6, 1982, fire doors were not inspected in accordance with Technical Specification 4.7.6.2.
- e. On May 5, 1982, it was discovered that the Unit 1, Division II Battery was inoperable. Action statement requirements of Technical Specification 3.8.2.4 were not satisfied in that unit tie breakers to the corresponding Unit 2 Division were not closed.
- f. Technical Specification 3.3.7.11 requires that with the Main Stack Monitoring System inoperable, grab samples be taken for noble gas emitters, continuous monitoring be implemented for iodines and particulates, and flow rates be estimated every four hours. Contrary to the above requirements, on May 2, 1982, the Main Stack Monitoring System was made inoperable as a result of inadequate system reviews prior to taking bus 141Y out-of-service for maintenance and compensatory action was not implemented for approximately seven hours.

- g. Technical Specification 3.3.7.10 requires that the radioactive liquid effluent monitoring instruments for Service Water and RHR Service Water be operable with alarm/trip setpoints determined in accordance with the Offsite Dose Calculation Manual (ODCM). Contrary to the above requirements, the Service Water and RHR Service Water Systems were operated from April 19, 1982 through May 11, 1982 with alarm/trip setpoints established nonconservatively with respect to the ODCM.

This is a Severity Level IV violation (Supplement 1).

2. 10 CFR 50.59 requires, in part, that, the holder of a license authorizing operation of a production or utilization facility may (i) make changes in the facility as described in the Safety Analysis Report without prior Commission approval, unless the proposed change, test or experiment involves a change in the Technical Specifications incorporated in the license or an unreviewed safety question. An unreviewed safety question is deemed to exist. Further, for changes performed pursuant to 10 CFR 50.59, a written safety evaluation must be completed providing the basis for the determination that an unreviewed safety question is not involved.

Technical Specification 6.1.G.2 requires, in part, that the Onsite Review and Investigative Function shall, "Review all proposed changes or modifications to plant systems that affect nuclear safety."

Technical Specification 3.6.5.3 requires, in part, that two independent Standby Gas Treatment Subsystems shall be operable when irradiated fuel is being handled in the secondary containment and during core alterations and operations with a potential for draining the reactor vessel.

Contrary to the above requirements, the Standby Gas Treatment System was modified without review on April 25, 1982. The modifications performed involved lifting leads which made the system inoperable to Division II initiating signals and made the system susceptible to single failure. During the period April 25-30, 1982, core alterations were continued in the form of fuel loading with the Standby Gas Treatment System inoperable.

This is a Severity Level IV violation (Supplement 1).

3. Technical Specification 3.4.3.1 requires, in part, that in Operational Mode 3, two leakage detection systems be operable. Technical Specification 4.4.3.1 specifies that a functional test be performed on the three leakage detection systems at least every 31 days.

Contrary to the above requirements, on June 5, 1982 Unit 1 entered Operational Mode 3 with no operable leakage detection systems. The

systems had not been functionally tested within 31 days of entering Mode 3.

This is a Severity Level IV violation (Supplement 1).

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