

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

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As a result of the inspection conducted on November 30 through December 3, 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 XIII, handling, Storage and Shipping states in part that, "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

The Byron FSAR, Chapter 17.0, Quality Assurance, states in part: "Therefore the Commonwealth Edison Topical Report CE-1-A, Revision 7 and all subsequent revisions unless otherwise noted in this chapter, is the basis for the QA program at Byron/Braidwood Station."

The Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 22 dated November 1, 1982, Section 13, "Handling, Storage and Shipping," states "Written instructions for handling, preservation, storage and shipping will be used to specify protective conditions necessary to prevent damage or deterioration of materials and equipment."

The Commonwealth Edison Company Quality Assurance Program Topical Report CE-1-A, contains in Quality Requirement (Q.R.) 2.0, a commitment to the regulatory position of Regulatory Guide 1.38, Revision 2 which endorses the requirements of ANSI N45.2.2-1972.

The Byron/Braidwood FSAR; Appendix A - Application of NRC Regulatory Guides, Regulatory Guide 1.38, Revision 2, Section A1.38-1, Amendment 37, March 1982, states in part, "The applicant complies with this regulatory guide. Packaging shipping, receiving, storage and handling of PWR power plant equipment are covered by quality specifications based on ANSI N45.2.2-1972."

- a. ANSI N45.2.2-1972, Section 6.1.2, Levels of Storage, Sub-section (1) states in part, "Level A items shall be stored under special conditions similar to those described for Level B items, but with additional requirements such as temperature and humidity control within specified limits...."

Contrary to the above, the licensee does not have an adequate program to ensure proper monitoring and control of temperature and humidity of storage facilities as evidenced by the lack of temperature monitoring and control systems in the CECO site storage warehouse assigned to Hatfield Electrical Company (HECo) housing Level B safety related electrical equipment and the lack of temperature and humidity monitoring and control systems in the CECO site storage warehouse assigned to Hunter Corporation (Hunter) housing Level A and B safety related mechanical equipment as of December 3, 1982.

- b. ANSI N45.2.2-1972, Section 6.2.2., Cleanliness and Housekeeping Practices, states in part, "The storage areas shall be cleaned as required to avoid the accumulation of trash, discarded packing materials and other detrimental soil."

Contrary to the above, the licensee has not established adequate controls to maintain the required storage area cleanliness levels as evidenced by the accumulation of styrofoam type packing materials, plastic packing bags, soft drink cans, scrap material and other assorted debris observed in, on, and under warehouse storage racks in the CECO site storage warehouse assigned to Hunter housing Level A and B safety related mechanical equipment.

- c. ANSI N45.2.2-1972, Section 6.2, Storage Areas, states in part, "Periodic inspections shall be performed to assure that storage areas are being maintained in accordance with these requirements."

Section 6.3.1, Ready Access to Stored Items, states that, "All items shall be stored in such a manner as to permit ready access for inspection or maintenance without excessive handling, to minimize risk of damage."

Contrary to the above, the licensee has failed to implement a plan or procedure to assure access to stored items for required inspections as evidenced by the methods of stacking and storing of safety related mechanical equipment observed in the CECO site storage warehouse assigned to Hunter.

- d. ANSI N45.2.2-1972, Section 6.3.3, Storage of Hazardous Material, states that, "Hazardous chemicals, paints, solvents, and other materials of a like nature shall be stored in well ventilated areas which are not in close proximity to important nuclear plant items."

Contrary to the above, the licensee has not demonstrated an effective system of controls to prevent improper storage of hazardous materials as evidenced by the stacking and storing of 5-gallon cans of paint in, among, and under important nuclear plant items observed in the CECO site storage warehouse assigned to Hunter.

This is a Severity Level V 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. Consideration may be given to extending your response time for good cause.

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Dated

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