

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Locket No. 50-454

Docket No. 50-455

As a result of the inspection conducted on November 1 through December 31, 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 B, Criterion V, states in part that "activities affecting quality shall be prescribed by documented instructions, procedures, or drawings....and shall be accomplished in accordance with these instructions, procedures, or drawings."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 21, dated June 6, 1982, states in Section 5 that "activities affecting quality are required.....to be prescribed by documented instructions, procedures, or drawings." Section 3 states that designs and materials will conform to....applicable codes, standards, regulatory requirements, SAR commitments and appropriate quality standards as applicable".

Contrary to the above, the following examples of failure to comply with the requirements were identified:

- a. The design basis bolting commitments as specified in the FSAR and specifications were not adequately translated into design drawings and internal documents; in that high strength bolting practice actually implemented was not consistent with design specifications.
- b. The installation of hangers for Unit 1, HVAC Nos. S-1847 and S-1848 were not installed as required by S&L Sketch S-0207.

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

2. 10 CFR 50, Appendix B, Criterion X, states in part "a program for inspection of activities affecting quality shall be established and executed.....to verify conformance with the documented instructions.

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 21, dated June 6, 1982, states in Section 10 "Inspection Programs will be established to provide assurance that quality control surveillance, inspections....are performed. Written procedures or checklists will be used to specify and verify final inspections and tests".

Contrary to the above, HVAC hanger installations have been completed without quality control inspection requirements being identified, without quality control inspections being performed, without quality records being established.

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

10 CFR 50, Appendix B, Criterion V states in part that "activities affecting quality shall be prescribed by documented instructions, procedures or drawings....and shall be completed in accordance with these instructions, procedures, or drawings".

Commonwealth Edison Company Topical Report CE-1-A "Quality Assurance Program for Nuclear Generating Stations", Revision 21, dated June 6, 1982, states in Section 5 that "activities affecting quality are required....to be prescribed by documented instructions, procedures, or drawings".

American National Standard ANSI N45.2.2-1972, "Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants", states in Section 2: "This section contains requirements that are to be fulfilled....". Section 2.1 states that "...Planning shall take into account the need for preparation and control of procedures and work instructions as necessary to comply with specified requirements.... to assure that....handling activities have been incorporated and that they can be accomplished as specified." Section 2.2 states "Procedures and instructions shall be generated, used, and maintained current."

American National Standard ANSI N45.2.15-1981 "Hoisting, Rigging and Transporting of Items for Nuclear Power Plants" states in Section 2: "This section contains requirements that are to be fulfilled....". Section 2.1 states "...Planning shall take into account the need for the preparation and control of procedures and work instructions.....". Section 2.2 states "Procedures and instructions as required by this standard shall be generated, approved, implemented, and maintained current."

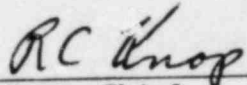
Contrary to the above, the Unit 2 Reactor Vessel closure head was installed in the reactor vessel on December 20, 1982, and the Unit 1 reactor vessel closure head, upper internals and lower internals were being removed from the reactor vessel without use of a current authorized handling procedure. The required planning effort had not been accomplished to ensure proper cleanliness of the work area, preparation and issue of a handling procedure, and without performing a proper visual examination of lifting and handling equipment, and without performing appropriate nondestructive testing of the handling equipment.

A review of records indicate that the Unit 1 reactor vessel closure head and/or internals had previously been handled once and the Unit 2 reactor vessel closure head and/or internals had been previously handled four times without utilizing proper planning, use of a current authorized handling procedure and appropriate nondestructive testing of lifting and handling equipment.

This is a Severity Level IV 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 shown.

Dated JAN 26 1983



R. C. Knop, Chief
Projects Branch 1