

NOV 29 1990

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-455

As a result of the inspection conducted from October 3 through November 14, 1990, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1990), the following violations were identified:

1. Technical Specification 3.7.1.2 requires at least two independent steam generator auxiliary feedwater pumps and associated flow paths operable in Mode 1. With one auxiliary feedwater pump inoperable, the Technical Specification action statement for 3.7.1.2 required the auxiliary feedwater pump to be in an operable status within 72 hours or be in at least hot standby within the next 6 hours and in hot shutdown within the following 6 hours.

Contrary to the above, the licensee failed to declare the 2A auxiliary feedwater (AFW) pump inoperable and enter the appropriate Technical Specification action statement on August 8, 1990, when two pipe struts were removed on the essential service water suction piping for pre-outage modification work that rendered the 2A AFW pump inoperable. At the time of the pipe support removals Unit 2 was in Mode 1 at 49% reactor power.

This is a Severity Level IV violation (Supplement 1) (50-455/90023-01(DRP)).

2. 10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison's Quality Requirement 5.0, states that activities affecting quality shall be prescribed by documented instructions and procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions and procedures.

BAP 370.3, Revision 6, "Administrative Control During Refueling", step C.44, states that prior to release of a fuel assembly being seated in a spent fuel rack, a cognizant management individual shall independently verify proper location as specified in the PWR Nuclear Component Transfer List.

BAP 2000-3, Revision 8, "Safeguard and Controlling Movements of Nuclear Fuel Within a Station", step C.5, states the Fuel Handling Foreman shall verify correct fuel assembly location after insertion of each fuel assembly into the assigned storage rack by initialing each step of the PWR Nuclear Component Transfer List.

- a. Contrary to procedures BAP 370-3 and BAP 2000-3, fuel assemblies were placed in the wrong spent fuel rack location on January 22, August 22, and September 25, 1990.

BMP 3118-5, Revision 5, "Reactor Vessel Upper Internal Installation", steps f.2.d and f.2.e, states to slowly raise the rig and upper internals off the storage rack until the rig and internals have cleared the storage stand and guide studs. Move the rig and upper internals over the reactor vessel.

- b. Contrary to procedure BMP 3118-5, the Unit 2 upper internals were not kept adequately clear of the storage rack while moving the upper internals to the reactor vessel. As a result, several guide pins were bent that have to be straightened or cut off prior to inserting the upper internals in the reactor vessel.

This is a Severity Level IV violation (Supplement 1) (50-455/90023-02(DRP)).

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 violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

11/29/90  
Dated

W D Shafer  
Wayne D. Shafer, Chief  
Reactor Projects Branch 1