

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

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As a result of the inspection conducted on September 1 through October 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, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants states in part:

"XVI Corrective Action...Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformancies are promptly identified and corrected."

Byron Station Startup Manual, Revision 11, dated 1982, Section 4.1.4 "Deficiencies," states in part: "The person, or persons, assigned to carry out corrective action complete the work and briefly describe the results."

Contrary to the above, on September 3, 1982, Project Construction, indicated, on Deficiency Report Form No. 1702, that corrective action (installation of the reactor cavity sump weirplate) had been completed and forwarded the Deficiency Report for closeout.

Installation of the weirplate was incomplete in that three of nine weirplate mounting bolts required to maintain a leak tight seal between the weirplate and the weirwall were not installed.

This is a Severity Level V Violation (Supplement II).

2. 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants states in part:

"XI Test Control...A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents."

The Byron FSAR, Chapter 17.0, Quality Assurance, states in part: "Therefore the CE 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."

Commonwealth Edison Company Topical Report CE-1-A, Quality Assurance Program for Nuclear Generating Stations, Revision 20 dated February 17, 1982, Section 11, states in part: "Preoperational tests which are performed on critical safety Category I equipment are controlled by approved written procedures..."

Byron Station Startup Manual, Revision 11 dated October 12, 1982, Section 4.1 states: "Deficiencies are documentation of incomplete or improper installation, documentation, design, or testing identified at the time of Turnover for Test, or thereafter. The individual who identifies an item of incomplete or improper installation, documentation, design, or testing will complete the Deficiency Description on the Deficiency Report Form (Form SU 4-1), and provide the originator's name and the date."

Byron Startup Manual, Revision 11, dated October 12, 1982, Section 4.6 states in Part: "The System Test Engineer will determine which deficiencies must be cleared prior to testing."

Contrary to the above:

- a. On October 1, 1982, during Containment Spray System preoperational testing, Licensee test personnel learned that electrical Drawing 6E-4030-CS08, Revision C, incorrectly specified the time delay associated with the "Eductor 1A Additive Flow Low" annunciator as 200 msec while the preoperational test procedure and instrument data sheet specified the time delay to be approximately 30 seconds. A Deficiency Report was not written until October 4, 1982, after the inspector had informed test personnel that the failure to do so appeared to be in noncompliance with the Byron Startup Manual.

- b. Test personnel attempted to perform Section 9.2 of the Containment Spray preoperational test while unable to determine the impact of Deficiency No. 2.017.10.005 on testing. Testing could not be complete due to this deficient condition.

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

3. 10 CFR 50, Appendix B, Criterion XIII states, in part, that "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment...to prevent damage or deterioration."

The Commonwealth Edison Company Quality Assurance Program contains, in quality Requirement QR 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. Section 6.5 of ANSI N45.2.2 states, in part, that, "Items released from storage and placed in their final locations within the power plant, shall be...cared for in accordance with the requirements of Section 6 of this Standard." Section 6 of ANSI N45.2.2 states in part that, "(6.1.1) Levels and methods of storage necessary are defined to minimize the possibility of damage or lowering quality due to corrosion, contamination, deterioration, or physical damage. (6.2.2) Cleanliness and good housekeeping practices shall be enforced at all times in the storage areas. (6.4.2) Items...shall have all covers, caps, plugs or other closures intact...covers removed for internal access at any time for any reason shall be immediately replaced and resealed after completion of the purpose for removal."

Contrary to the above, the Licensee does not have an adequate program to ensure proper care and preservation of safety related equipment as evidenced by numerous instances of missing or damaged penetration covers and piping end caps identified during tours of Units 1 and 2 containments and the auxiliary building between September 1 and October 31, 1982. This is a repetitive item of noncompliance identified in Inspection Report No. 50-454/82-02.

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

4. 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants states, in part:

"XVI Corrective Action...Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected..."

The Commonwealth Edison Quality Assurance Manual defines a nonconformance as: "A deficiency in characteristic, documentation or procedure which renders the quality of an item unacceptable or indeterminate. Examples of nonconformance include: physical defects, test failures, incorrect or inadequate documentation and deviation or variation from prescribed processing, inspection or test procedures."

Commonwealth Edison Quality Procedure QP No. 15-1, "Reporting Quality Nonconformances During Construction and Test," Section 5.3 states, in part: "Upon detection by Commonwealth Edison Company of an onsite nonconformance, a Nonconformance Report (NCR), Form 15-1.1, is initialed by the Site Construction Superintendent or Project Engineer with review and signature by the Site Quality Assurance Superintendent, or designees. The NCR shall contain sufficient description to positively identify the nonconformance, and, when applicable, a suggested resolution. The NCR is submitted, as applicable, to the Project Engineering or Station Nuclear Engineering Department Project Engineer for review and approval."

Contrary to the above, the Licensee did not issue Nonconformance Reports or perform formal evaluations of the impact on quality of safety related equipment resulting from failures of contractors to perform required quality control inspections, as evidenced by the following examples of missed quality control inspections identified by the Licensee and not evaluated to determine appropriate corrective action.

- a. The quality control inspection required by Sequence No. 3 of Hunter Process Sheet 1RC018D, "Final Setting of Unit 1 Steam Generators" was identified in January 1979, as not being documented and therefore not verifiable as having been performed.
- b. The quality control inspections of all four Unit 1 Safety Injection Accumulators prior to grouting, required by Hunter Site Implementing Procedure 4.201, Revision 2, were identified as not having been performed after grouting had been completed.

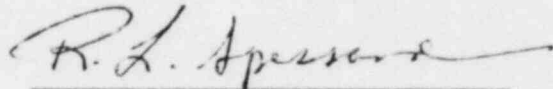
- c. The quality control inspections to verify lubrication of reactor coolant pump support anchor bolts required by Hunter Process Sheet 1RC01P, Revision 2, were not performed.

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.

NOV 20 1982

Dated



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