

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-456

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As a result of the inspection conducted on February 10, 11, 17-18, 22-24, March 2-3, 10, 16-18, 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, "Instructions, Procedures, and Drawings" states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Commonwealth Edison Company Topical Report CE-1-A, Section 5, states in part, "Activities affecting quality are required by the Edison Quality Program to be prescribed by documented instructions, procedures or drawings."

Braidwood S&L Specification L-2722, "Post Tensioning Installation" includes in Section 13-105.2, "shop drawings shall include detail and erection drawings, and shall be accompanied by the following:

- a. Stressing Sequence Drawings, and also stressing records for each tendon."

Section 13-603.2 includes in part, "... installer shall prepare a detailed stressing sequence schedule that shall be submitted in the form of stressing sequence drawings".

Section 13-603.3 states, "After final approval of these drawings, all stressing shall follow the approved schedules."

Contrary to the above, stressing of Unit 1 containment's post tensioning tendons has been completed without stressing sequence drawings having been prepared, reviewed, approved, or used to control the work; and a drawing record was not provided for the results of the work.

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

2. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action" states in part, "measures shall be established to assure that conditions adverse to quality, such as ... nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Commonwealth Edison Company Quality Assurance Manual, Q. R. No. 16.0 - "Corrective Action" states in part in Section 16.3, "records will be regularly reviewed and analyzed by quality assurance and engineering personnel:

- a. To assure that the causes of nonconformities and the corrective action have been clearly described.
- b. To determine whether corrective measures will preclude recurrence."

Commonwealth Edison Company Quality Procedure Q. P. No. 16-1, Section 5.4, states in part ---- "corrective action will be prescribed where recurring nonconformance is in evidence."

Contrary to the above, effective action was not taken to address corrective action to preclude recurrence or continuation of nonconformances associated with installation of cable pan and conduit hangers as follows:

An analysis of 319 L. K. Comstock nonconformance reports (NCR) over an eight month period indicated 68 were for incorrect materials, 60 were for dimensional errors, 71 for general noncompliance, 27 for incorrect fitup gaps, eight for incorrect location, and 16 for welding deficiencies. Many of these occurred during a three month portion of the eight month period. There was no recognition of significant adverse trends or the need for action to take effective corrective measures to prevent recurrence or the continuation of these nonconformances.

Seventy percent of the hangers had not been completed or inspected for configuration compliance. Two hundred and thirteen of the 319 NCR's written during the eight month period had been recommended for "use-as-is" disposition. Many of these will require a design review for effect on structural integrity.

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

3. 10 CFR 50, Appendix B, Criterion XIII, "Handling, Storage and Shipping" states in part, "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."

ANSI N45.2.2 states in part, in Section 7.2, "Detailed handling instructions and procedures shall be prepared for all items that require special handling instructions because of weight, size, susceptibility to shock damage, high nil ductility transition temperatures, or any other conditions that warrant special instructions.

Commonwealth Edison Company Quality Assurance Manual Quality Procedure Q.P. No. 13-1 states in part, in Section 4.2, "... Items requiring special handling will be identified in the contractor's procurement documents. Special handling tools and equipment, when applicable, will be verified as complying with periodic test and inspection contractor approved procedures. Special procedures developed by the contractor for the unusual components will be utilized when applicable. Equipment identified for special handling and control will be noted in a control and followup system administered by construction ..."

Phillips, Getschow Co. Quality Control Procedure QCP B4, states in part, in Revision No. 1, Section 6.1, "Where an item weight exceeds 20,000 (lbs.) (approximately 9091kg), or where indicated by the customer because of other considerations such as configuration, material properties, or safety relatedness: a "special lift procedure" shall be established."

Contrary to the above, there were no special lift procedures written, reviewed, approved, or used for the special lifts handled by Phillips, Getschow Co. during their handling and installation of safety related equipment, materials and components on Unit 1.

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

4. 10 CFR 50, Appendix B, Criteria VI, "Document Control" states in part, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."...

Commonwealth Edison Company Quality Assurance Manual, Q.R. No. 6.0 - "Document Control" states in part, "A document control system will be used to assure that documents such as specifications, procedures, and drawings are reviewed for adequacy and approved for release by authorized personnel... Such documents will be distributed to and used at the locations where the prescribed activity is performed. Changes to these documents will be handled similarly... Each document recipient is responsible for ensuring that only the latest authorized documents are in use and the void documents are so identified."...

Commonwealth Edison Company Procedure Q.P. No. 6-1 states in part:

"Each recipient listed on the applicable distribution list shall, upon receipt of new documents, destroy or segregate and clearly mark all superseded documents. Each receiving office or area shall have a controlled method for checking receipt of new or revised documents, and assuring that the latest revised document is in use."

Commonwealth Edison Company Procedure BG-2 states in part, "one copy of required vendor drawings will be put ... on a rack as determined by the responsible field engineer ... If a superseded vendor print is kept, it will be stamped "superseded" ..."

Contrary to the above, nine out of 25 post tensioning vendor drawings on the rack in the Braidwood site construction office for Unit 1 were superseded and not identified as such, six out of 22 similar drawings for Unit 2 were also superseded and not identified as such, and the latest revisions of the superseded drawings were not distributed and used at this prescribed location.

This demonstrates that approximately one-third (32 percent) of the total required post tensioning vendor drawings at this drawing control location were out of control.

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 shown.

Dated JUL 7 1982

for W. J. Little

C. E. Norelius, Director
Division of Engineering and
Technical Programs