

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-254
Licensee No. DPR-29

As a result of the inspection conducted on January 28 through February 14, 1991 and March 21, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions " 10 CFR Part 2, Appendix C, (Enforcement Policy, 1989) the following violations were identified:

1. 10 CFR Part 50, Appendix B, Criterion III, requires in part, that design changes be subject to design control measures commensurate with those applied to the original design. This control includes the specification of design bases and that verification of the design be accomplished through a design review or adequate testing program. It also requires that the design basis be correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, the following violations were identified:

- a. An inadequate design review was performed for modification M-4-1-8819, failing to include the seismic qualification reports regarding whether installed instrumentation would remain within calibration.
- b. The maintenance work instruction associated with modification M-4-1-88-016 open limit switch/close indication rotor setup failed to appropriately translate the design specification that the rotor be set at a safe distance away from the full open position of the associated motor-operated valves. Furthermore, the associated procedure did not require documentation of the final setup.

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

2. 10 CFR 50, Appendix B, Criterion XI, requires in part, that a test program be established to assure systems will perform satisfactorily in service. The test shall be performed in accordance with written procedures, which contain acceptance limits. Test results shall be documented and evaluated to assure that test requirements have been satisfied.

Contrary to the above, the following violations were identified:

- a. Modification M-4-1-88-019 construction test failed to document the basis for concluding that the temperature gauge was satisfactory when the test results were outside of the acceptance limits specified by

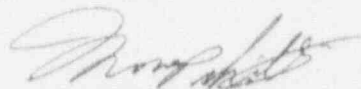
engineering. The acceptance criteria were subsequently modified without proper test failure evaluation. Furthermore, the modification test procedure failed to incorporate the engineering instruction to monitor leakage of the Emergency Diesel Generator turbo oil pump into the modification test procedure.

- b. The testing associated with Modification M-4-0-89-066 was inadequate to assure adequate air-operated containment valve leakage in that the test did not specify a minimum leak rate but rather evaluated a leakage time irrespective of initial testing pressure.
- c. Although minor design change 04-1-91-009 specified that functional verification testing for the motor-operated valves would be performed using the VOTES method, no testing acceptance criteria were specified.

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

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 steps that have been taken and the results achieved; (2) the corrective steps 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.

3/25/91
Dated



Monte P. Phillips, Chief
Operations Branch