

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

Docket No. 50-374

As a result of the inspection conducted on August 4-27, 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 XVIII "Audits," requires that a comprehensive system of audits be carried out to verify compliance with all aspects of the QA Program. Section 18 of the CECO QA Manual requires that audits be performed at specified periods to fulfill this requirement.

Contrary to the above, CECc audits of Morrison Construction Company were inadequate in that the noncompliances identified by the NRC during this inspection were not identified by the CECO audits for periods ranging from two to seven years, depending upon the item. (For most items, audit periods were semiannual or yearly.)

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

2. 10 CFR 50, Appendix B, Criterion XII "Control of Measuring and Test Equipment," requires that measures be established to assure tools, gauges, instruments, and other measuring and test devices are properly controlled, calibrated and adjusted at specified periods to maintain accuracy within necessary limits. Criterion V requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings. Section 10 of the MCCo QA Manual establishes procedural requirements to fulfill these regulatory requirements. MCCo Procedure PC-31 provides the instructions for performing such calibrations and adjustments at specified periods.

Contrary to the above, one or more of the following discrepancies were found to apply to ten different types of tools or measuring and test devices:

- . Equipment not addressed in procedure PC-31 (or other procedures).
- . Equipment addressed but acceptance criteria for adjustments or calibrations either (1) not specified, or (2) improperly specified.

- Equipment addressed (for example, need to calibrate or calibration frequency) but no instructions supplied to perform work (or reference to instructions, such as manufacturer's manual).

Additionally, the individuals performing calibrations of torque wrenches and hydrostatic and test pressure gauges routinely deviated from the requirements of the approved procedures.

It appears that these discrepancies have existed since the program was implemented in 1974.

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

- 10 CFR 50, Appendix B, Criterion XV, "Nonconforming Materials, Parts, or Components," requires that measures be established to control nonconforming items to prevent their use. Section QA-13 of the MCCo QA Manual implements this requirement by requiring that nonconforming items be labeled and dispositioned using a Nonconformance Report (NCR).

Contrary to the above, on June 22, 1982, the inspector witnessed the identification of a nonconforming torque wrench, and no NCR was prepared. Moreover, the licensee confirmed that the requirements of QA-13 were not uniformly implemented for measuring and test equipment in his report of special audit, dated July 8, 1982.

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

- 10 CFR 50, Appendix B, Criterion XVII, "Quality Assurance Records," requires that sufficient records be maintained to furnish evidence of activities affecting quality, including, at least: operating logs; results of reviews, inspections, tests, and audits; monitoring of work performance; materials analyses; and closely related data such as identity of inspector, type of observation, results, acceptability, and actions taken in connection with noted deficiencies. MCCo QA Manual, Chapter QA-11 and QA-6 implement program requirements for identifying, recording, and storing quality records, and for performing receipt inspection, respectively.

Contrary to the above, numerous instances of failure to perform adequate receipt inspections for measuring and test equipment, and failure to record accurate data in records of activities affecting quality were noted during the period of 1980 through 1982.

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

5. 10 CFR 50, Appendix B, Criterion VI, "Document Control," requires that measures be established to control the issuance of documents (instructions, procedures, drawings) including changes thereto.

Contrary to the above, MCCo Welding Procedure P8-18LS, Revision 4 was issued on November 21, 1980. The revision was not included in the procedure for welding grid Volt/Amp surveillance as of June 1982. Additionally, Drawing No. 21N-48, Revision B was approved and issued for construction on February 23, 1982 requiring Revision 3 of P8-18LS for the control of welding.

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

6. 10 CFR 50, Appendix B, Criterion IX, "Control of Special Processes," requires that measures be established to ensure the adequacy of special processes. As a portion of the program to comply with this requirement, MCCo implemented procedure PC-41, Revision 0 which requires that a weekly surveillance of welding grid volts/amps be conducted, and that results be recorded on Form PC-84.

Contrary to the above, the surveillances were not adequately implemented in that approximately 350 records of consecutive weekly surveillances contained 199 examples of accepted out of tolerance data, missing data and signatures, use of wrong acceptance criteria, and improper weld procedure references.

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

7. 10 CFR 50, Appendix B, Criterion IX, "Control of Special Processes," and Criterion X, "Inspection," require that measures be established to ensure the adequacy of special processes. As a portion of the program to meet these requirements, the licensee requires Nondestructive Examination of welding activities on components which are important to safety.

Contrary to the above, final QC acceptance of the piping support controlled by traveler RH63-2895C (Drawing M939-2) was accomplished on June 23, 1982 without fulfilling the requirement for weld dye penetrant or magnetic particle testing required by Drawing M939-2.

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

8. 10 CFR 50, Appendix B, Criterion XV, "Nonconforming Materials, Parts, or Components," requires that measures be established to control items which do not conform to requirements in order to prevent their inadvertent use or installation. Measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition, and notification of affected organizations. Section QA-13 of the MCCo QA Manual implements the MCCo requirements for control of nonconforming items, including repair or rework.

Contrary to the above, the requirements for control of nonconforming items were not applied to controlling certain nondestructive examination (NDE) requirements, in that no method was implemented for tracking NDE requirements for base metal following rework (such as the removal of weldments).

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

9. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," requires that activities affecting quality shall be accomplished in accordance with appropriate instructions, procedures or drawings.

10 CFR 50, Appendix B, Criterion X, "Inspection," requires that examinations shall be performed for each work operation where necessary to assure quality.

Contrary to the above, two of the four bolts securing the motor operator to the yoke of an inboard main steam line drain isolation valve were found loose (not even hand tight). The mechanical joint checklist for this boltup indicated that these bolts had been torqued to 50 ft.-lbs. by two MCCo mechanics, verified by their supervisor and verified by an MCCo QC inspector.

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

10. 10 CFR 50, Appendix B, Criterion II, "Quality Assurance Program," requires that the applicant shall establish at the earliest practical time, consistent with the schedule for accomplishing the activities, a quality assurance program which complies with the requirements of this appendix. This program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with these policies, procedures, or instructions.

