

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

As a result of the inspection conducted on July 8, 9, 12-16, 27-30, 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 X states in part that, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity."

The Byron Startup Manual in Section 4.1.4.1 states, "Deficiencies are documentation of incomplete or improper installation, documentation, design, or testing identified at the time of Turnover for Test, or thereafter."

In addition, under Section 4.5 System Release for Testing, the Byron Startup Manual describes the following responsibilities:

- 4.5.2 Project Construction, the Project Operational Analysis Department and Site Quality Assurance will review the test System Data Package and document the status of each item for which they have responsibility. Deficiency drafts are prepared for items not completed.
- 4.5.3 The Project Construction Department Engineer and site Quality Assurance complete the QA/Construction System Review form (BSM 4-4) verifying all work is complete and that deficiency drafts have been prepared.
- 4.5.9 The Project Construction Superintendent and the Site QA Supervisor sign form QP 11-2.2 indicating either:
 - 5.9.1 All items indicated for release are signed off or
 - 5.9.2 All items indicated for release are signed off and deficiencies have been written, or

- 5.9.3 All items indicated for the release which are not signed off have had a deficiency written.

Contrary to the above:

- a. On July 8, 1982, three orifice plates in the component cooling system, 1FE-CC054, 1FE-CC055, 1FE-CC-056 were found to be missing despite the turnover package signoff indicating installation.
- b. At the time of initial conditions verification for test Procedure 2.66.10, the Test Engineer found the reactor cavity sump weir missing despite the turnover package signoff indicating all mechanical installation complete with no deficiencies relating to the weir.

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

2. 10 CFR 50, Appendix B, Criterion XIV states in part that, "Measures shall also be established for indicating the operating status of structures, systems, and components of the nuclear power plant or fuel reprocessing plant, such as by tagging valves and switches, to prevent inadvertent operation."

The Byron Startup Manual in Section 4.1.2.2 states, "Under re-entry control, systems cannot be taken out of service without the concurrence of the System Test Engineer or Pre-Op Coordinator as to the Out of Service Boundaries."

Contrary to the above:

- a. On July 9, 1982, after re-entry control had been established, the component cooling system lines to the waste gas compressor heat exchanger were found blanked off during post flushing flow verifications for the component cooling system. This was apparently done without the knowledge or concurrence of either the System Test Engineer or the Pre-Op Coordinator.
- b. On July 13, 1982, the System Test Engineer found relief valves OCC9425A and OCC9425 in the component cooling system had been removed without following re-entry control requirements.

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.

SEP 13 1982

Dated _____

"Original Signed by C.E. Norelius"

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