

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

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As a result of the inspection conducted on February 8-10, 15-17, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified:

10 CFR 50, Appendix B, Criterion II - Quality Assurance Program states, in part, "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

The Byron FSAR, Chapter 17.0, Quality Assurance, states in part, "Therefore, the Commonwealth Edison 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."

The Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 22 dated November 1, 1982, Section 2, "Quality Assurance Program," states in part, "Qualification and certifications will be maintained in a current status and will be established to meet the applicable requirements of ASME Code and ANSI Standard N45.2.6" Section 2 further states, in part, "Contractor personnel engaged in inspection, examination and testing activities will be required to be trained, qualified, and certified to perform their specific activity in accordance with the above requirements."

The Commonwealth Edison Company Quality Assurance Program Topical Report CE-1-A, contains in Quality Requirement (Q.R.) 2.0, Section 2.2.III, a commitment to the regulatory position of Regulatory Guide 1.58, Revision 1 which endorses the requirements of ANSI N45.2.6-1978.

The Byron/Braidwood FSAR, Appendix A - Application of NRC Regulatory Guides, Regulatory Guide 1.58, Revision 1, Section A1.58-1, Amendment 33, October 1981, states in part, "The applicant complies with the positions of this Regulatory Guide with the following exception:" (The exception is to the requirement for candidates to have earned a high school diploma or GED only).

Regulatory Guide 1.58, Revision 1, September 1980, Section C. Regulatory Position, Subsection 6 states in part, "Since only one set of recommendations is provided for the education and experience of personnel, a commitment to comply with the regulatory positions of this guide in lieu of providing an alternate to the recommendations of the standard means that

the specified education and experience recommendations of the standard will be followed."

ANSI N45.2.6, Section 3.5, Education and Experience - Recommendations, states in part, "The following is the recommended personnel education and experience for each level." Subsection 3.5.2 Level II, states in part, "(1) One year of satisfactory performance as Level I in the corresponding inspection, examination or test category or class, or; (2) High school graduation plus three years of related experience in equivalent inspection, examination, or testing activities, or".

Contrary to the above, it was determined that the Hatfield Electric Company was utilizing a Level II Quality Control Inspector to perform safety related inspection functions who did not meet the minimum related equivalent inspection experience requirements. Details of this apparent noncompliance are identified in Paragraph 5.b(3) of the attached report.

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.

MAR 24 1983

Dated

C. E. Norelius, Director
Division of Projects and
Resident Programs