

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

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As a result of the inspection conducted on August 11, 12, 16-19, 24-26, 31; September 1, 2, 6-9, 12-16 and 19, 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 V states in part, that "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..."

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...such as by tagging valves and switches, to prevent inadvertent operation."

Byron Administrative Procedure 300-18 states in part..."The operator(s) performing the OOS...initials the Equipment Outage Form in the column 'OOS by' after performing the OOS task." The procedure also states that "Work on safety-related or other important systems require an independent verification of the tagging and alignment by a second qualified individual...and shall be documented on the Outage Form..."

Production Instruction No. 1-3-A-1 states in part, that..."Equipment with...an OUT OF SERVICE CARD attached shall not be operated under any circumstance." and "...OUT OF SERVICE CARDS must be removed before energizing or operating equipment and the same or other cards must be placed on the equipment before resuming work."

Contrary to the above, Production Instruction No. 1-3-A-1 was not followed in two instances. On September 7, 1983, during the performance of VE 128.10, an operator positioned a handswitch without removing the Out of Service (OOS) that was attached to the handswitch. On September 8, during the Structural Integrity Test, an operator started to position a valve with an OOS tag still attached. When questioned by the Test Engineer, the operator correctly removed the tag under temporary lift and with Shift Engineer permission. The operator completed positioning the valve and then incorrectly rehung the tag with the valve in a position different from that specified by the OOS. Byron Administrative Procedure (BAP) 300-18 was not followed in that on September 2, 1983, during the line up for PC 58.11, an operator placed a series of OOS cards on valve handwheels and breaker panels without initialing the Equipment Outage Form as each task was completed. The required independent verification and subsequent documentation on the Equipment Outage Form was not performed for this line up.

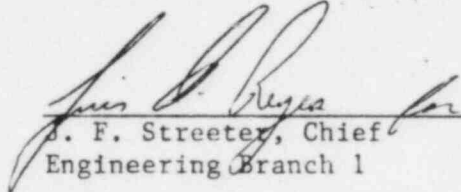
Further, none of the approximately one thousand Equipment Outage Forms processed under the current (as of September 2) revision of the BAP contained independent verification.

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.

OCT 11 1983

Dated _____


J. F. Streeter, Chief
Engineering Branch 1