

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-237

As a result of the inspection conducted on May 21 through July 19, 1983, 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 XVI, states in part, "Measures shall be established to assure that conditions adverse to quality, ...are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition." Commonwealth Edison Company Topical Report CE-1A "Quality Assurance Program for Nuclear Generating Stations," Section 16, states that corrective actions are verified for satisfactory completion to preclude repetition.

Contrary to the above, adequate corrective action to preclude repetition was not taken following a July 19, 1983, incident where a perforation was found in a corrugated expansion bellows on one of the torus-to-drywell vacuum breaker lines causing a breach of primary containment. This resulted in three more perforations on two other expansion bellows discovered on August 11, 1983.

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

2. Technical Specification 6.2.A.7, "Plant Operating Procedures," requires that detailed written procedures including applicable checkoff lists covering surveillance and testing requirements shall be prepared, approved and followed.

A note in Surveillance Procedure DOS-1600-1, "LPCI System Valve Operability Test," states, "Drain water between 1501-27 and 1501-28 before opening 1501-28 valves to prevent possibility of stagnant water plugging drywell spray nozzles. Leave control switches in normal operating position. Valve 1501-28 may be run after water is drained." Surveillance Procedure DOS-1500-1, "Quarterly Valve Timing," also tests the 1501-27 and 1501-28 valves.

Contrary to the above:

- a. Surveillance Procedure DOS-1600-1 was not sufficiently detailed in that it did not include the precautionary note concerning draining the water between valves 1501-27 and 1501-28 before manipulation of those valves.

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- b. Surveillance Procedure DOS-1500-1 was not sufficiently detailed in that valve numbers for the drain line valves between the 1501-27 and 1501-28 valves were not listed in the precautionary note.

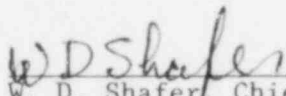
These procedural deficiencies resulted in operators attempting to carry out the precautionary note contained in Surveillance Procedure DOS-1500-1 prior to manipulating valves 1501-27 and 1501-28 during performance of Surveillance Procedure DOS-1600-1 on September 11, 1983. In attempting to take that precaution, the operators opened the high point vent valves instead of the drain valves and those vent valves remained open for approximately seven shifts. During the time that the vent valves were open, approximately 11-gallons of suppression pool water per minute were released to the reactor building and collected by the reactor building floor drain system. Under accident conditions, this would have resulted in an unanticipated release of radioactive materials from the suppression pool (primary containment) to the reactor building (secondary containment).

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 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 13 1983

Dated _____


W. D. Shafer, Chief
Projects Branch 2