

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-456

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As a result of the inspection conducted on April 1 through April 30, 1984, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion IX requires that measures shall be established to assure that special processes, including welding are controlled and accomplished in accordance with applicable codes.

Sargent and Lundy Specification, F/L-2735, Structural Steel, 11/25/77 commits to AWS D1.1, Structural Welding Code, 1975.

AWS D1.1, 1975, requires in Section 6, Inspection, the inspector shall examine the work to make sure that it meets the requirements of Section 3, which includes fit-up tolerances.

Contrary to the above, the Napoleon Steel Contractors, Inc. Quality Assurance Program did not require fit-up inspections for safety related structural steel members joined by welds and therefore, quality control personnel did not inspect and assure acceptable gaps for weld joints.

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

2. 10 CFR 50, Appendix B, Criterion XVI, as implemented by CECO QA Manual, QR No. 16.0, requires that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Commonwealth Edison Audit No. QA-20-80-22, performed on 5/30/80 and 7/10/80, stated that in-process inspections of welding activities conducted by Napoleon Steel Contractors, Inc. have not been performed in sufficient depth, as no documented in-process inspection is performed on the actual weld process itself for pre-heat, interpass temperature, position, weld bead layering and interpass grinding, where a defect could conceivably be buried deep with a multi pass weld.

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Contrary to the above, Commonwealth Edison Quality Assurance identified the inspection deficiencies but failed to take corrective action with regard to Napolean Steel Contractors, Inc. past welding inspection activities to assure that defects do not exist in multi pass welds.

- 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.

MAY 22 1984

Dated _____

RFWarnick

R. F. Warnick, Chief
Projects Branch 1