

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-456

Docket No. 50-457

As a result of the inspection conducted on May 1 through June 4, 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 V requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

ANSI N45.2.8, 1975, requires in paragraph 2.9, that engineering limitations be incorporated into procedures and instructions and shall include physical clearances; and paragraph 2.1 requires that activities shall be planned and documented to be consistent with engineering and design requirements.

Contrary to the above, the architect engineer, Sargent and Lundy, did not prescribe clearance criteria for safety related HVAC components or safety related large bore (>2") piping in relation to other items such as equipment, conduit, cable tray, or piping, and also failed to prescribe clearance criteria for safety related electrical items, such as cable tray or conduit, in relation to all piping, HVAC components, or equipment in documented instructions, procedures, or drawings. As a result, design control measures for installation and inspection activities were not adequate in that they did not address:

- . Hydraulic and thermal considerations that require flexibility and movement of items, including pipe supports, and the affect on items due to their close proximity or direct contact with each other,
- . Stress and compatibility of materials due to metal to metal contact and therefore subsequent item deterioration, degradation, or failure resulting from factors such as piping thermal expansion,
- . Accessibility of items for in-service inspection, maintenance, and repair,
- . Functional reliability of a component or item due to interferences.

8407250146 840702  
PDR ADOCK 05000456  
Q PDR

Furthermore, clearance installation limitations have not been required to be met by the contractors and therefore physical clearances have not been planned by craft personnel or documented in quality control inspection reports to assure the prompt identification of installation conditions adverse to quality.

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

2. 10 CFR 5J, Appendix B, Criterion V, requires that activities affecting quality shall be accomplished in accordance with the instructions, procedures, or drawings.

Whip restraint drawing LWR-RC1-6 Revision A, Field Change Order #5497, Weld Data Sheets FW-12 and FW-14, and F/L-2909 Amendment 6, dated October 12, 1979 - Specification for Pipe Whip Restraints all require ASTM A572 GR.50 material for a 1'9"x2'1"x1" whip restraint plate.

Contrary to the above, material installed for the 1'9"x2'1"x1" whip restraint plate, identified on drawing LWR-RC1-6 Revision A, was ASME SA-516 GR.60.

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.

JUL 02 1984

          
Dated

*Original signed by J. Harrison for*  
R. F. Warnick, Chief  
Projects Branch 1