

APPENDIX A
NOTICE OF VIOLATION

Commonwealth Edison
Braidwood Units No. 1 and 2

Docket Nos. 50-456
50-457
License Nos. CPPR-132/133

As a result of the inspection conducted on April 9-20, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register Notice (49FR8583) dated March 8, 1984, the following violations were identified:

- A. 10CFR50, Appendix B, Criterion IX requires that special processes such as nondestructive testing, be accomplished in accordance with applicable codes. The Piping System Fabrication Specification 2741, paragraph 108.1 invokes the ASME III Code, 1974 Edition, Summer 1975 Addenda, for the installation of piping systems.

The ASME III Code directs that nondestructive testing be accomplished in accordance with the ASME V Code.

The ASME V Code requires that:

- Paragraph T-263.1, penetrameters be placed adjacent to the weld seam and not in the area of interest.
- Paragraph T-233.2, radiographs be free from mechanical, chemical or other blemishes that might mask or be confused with discontinuities.
- Paragraph T-233.1, Part III of Recommended Practice SE-94 shall be used for film processing. SE-94, paragraph 20.10, recommends radiographic film fixers be adequately removed to assure archival quality film.

Contrary to the above, a review of ASME III Code piping radiographs on April 9-20, 1984, disclosed the following:

- (1) Weld No. Q6056-CV-23-6, welds 6 and 8, had penetrameters placed in the area of interest.
- (2) Weld No. Q6056-CV-23-6, weld 6, film stations 2 to 3, had mechanical, chemical, or other blemishes that might obscure discontinuities.
- (3) Weld No. Q6056-CS-108-9-16, weld 6, had pentrameters placed in the area of interest.

- (4) Weld Nos. Q6056-CV-23-6, weld 8, and Q6058-CS-78-16-2, welds 8,9,10, and 11 have degenerated film quality from inadequate fixer removal and do not meet archival quality standards.

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

- B. 10CFR50, Appendix B, Criterion XV, requires that nonconforming items be identified, reviewed and dispositioned in accordance with documented procedures. The Site Quality Assurance Manual, Section 15, requires that Nonconformance Reports be written when material is believed to be nonconforming.

Contrary to the above, an NRC review of pipe weld radiographs on April 9-20, 1984, disclosed that pipe welds Nos. M1962-LP3-FW-12, M1962-LP2-FW-2, M1962-LP3-FW-2, and M1962-LP1-FW11-R1 were identified as containing rejectable base metal indications but were not reported on nonconformance reports. These defects were not dispositioned in accordance with approved procedures.

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

- C. 10CFR50, Appendix B, Criterion IX, directs that nondestructive testing be accomplished in accordance with appropriate codes. The Piping System Installation Specification, F-2739L-2739, invokes the ASME III Code, 1974 Edition, Summer 1975 Addenda. The ASME III Code directs that nondestructive testing be accomplished in accordance with ASME V Code.

The ASME III Code, paragraph NC5320, directs that for sections of welds that are shown by radiography to contain any type of crack or zone of incomplete fusion they are to be classified as unacceptable.

The ASME V Code, paragraph T-263.2, requires that the density of the radiograph shall not vary by more than minus 15% or plus 30% in the area of interest relative to the density through the penetrameter.

Contrary to the above, an NRC review of pipe weld radiographs on April 9-20, 1984, disclosed the following:

- (1) The ASME Class 2 welds Nos. W044FW11RS, CV17-FW2CRS, and SI14-FW9 contained zones of incomplete fusion and cracks and were not rejected.
- (2) Weld No. SI13-FW15R1, film station 14, contained an area of weld drop through that exceeded the minus 15%, plus 30% film density requirements.

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

- D. 10CFR50, Appendix B, Criterion VI, Document control requires that measures be established to control the issuance of documents such as drawings, including changes thereto, which prescribe activities affecting quality. Site Procedure GO-3.13, Rev. 6, requires Engineering Change Notices (ECN's) to be adequately shown on design documents.

Contrary to the above, an NRC review during April 9-20, 1984, disclosed that the site licensee construction Quality Assurance operative working drawing file did not reflect current revisions or ECN's on the drawings and these drawings were being used to verify quality related activities.

This is a Severity Level V violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.