

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-456

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As a result of the inspection conducted on March 26, 28-29, April 3-5, 10-12 and May 23 and 31, 1984 and in accordance with the NRC Enforcement Policy 47 FR 9987 (March 9, 1982), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion II, as implemented by Section 2 of the Commonwealth Edison (CECo) Quality Assurance Program (QAP) Topical Report, requires the program for the indoctrination and training of personnel to be documented by written policies, procedures or instructions and carried out in accordance with those policies, procedures or instructions.

Contrary to the above:

1. L. K. Comstock failed to establish and implement a program for identifying the required reading for weld inspectors as part of their required training for certification.
2. L. K. Comstock failed to establish and implement a suitable program for conducting practical tests for the purpose of ascertaining if prospective weld inspectors were proficient in identifying weld defects.
3. Gust K. Newberg Construction Company failed to adequately implement the personnel indoctrination and training program with regard to the grading of General Tests given to QC inspectors. Specifically, three of the six tests reviewed were misgraded.

This is a Severity Level V violation (Supplement II)

- B. 10 CFR 50, Appendix B, Criterion II, as implemented by Section 2 of the CECo QAP Topical Report, requires the program to take into account the need for skills necessary to attain the required quality and to provide for indoctrination and training of personnel performing activities affecting quality.

Contrary to the above, four L. K. Comstock weld inspectors were not proficient in the American Welding Society Structural Welding Code, AWS D1.1. This was evidenced by their inability to answer questions pertaining to the repair of weld cracks and fit up tolerances.

This is a Severity Level IV violation (Supplement II)

- C. 10 CFR 50, Appendix B, Criterion XV, as implemented by Section 15 of CECo QAP Topical Report, requires that nonconforming items be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures.

Contrary to the above, L. K. Comstock weld inspectors allowed craft personnel to repair/rework weld defects identified during final QC inspections, thereby circumventing the nonconformance reporting system.

This is a Severity Level IV violation (Supplement II)

- D. 10 CFR 50, Appendix B, Criterion XVI, as implemented by Section 16 of CECo QAP Topical Report, requires conditions adverse to quality be promptly identified and corrected.

Contrary to the above, CECo did not take appropriate corrective action with regard to Audit QA-20-80-22, in that, an assessment of the QC inspectors qualifications was not performed to address the potential impact on work performed prior to the audit finding.

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 20 1984

Date

Roger D. Walker  
R. D. Walker, Chief  
Operations Branch