

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company
Byron Station Units 1 and 2

Docket Nos. 50-454; 50-455
License No. CPPR-130; CPPR-131

As a result of the special inspection conducted on April 26 through July 17, 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. Appendix B to 10 CFR Part 50, Criterion XV states, in part, "Measures shall be established to control material, parts or components which do not conform to requirements in order to prevent their inadvertent use or installation." The Byron Safety Analysis Report, Chapter 17 and the Commonwealth Edison Topical Report CE-1-A provide the basis for the Quality Assurance Program at the Byron Station. Section 15, "Nonconforming Material, Parts or Components and Operations," of CE-1-A requires that items or conditions which are found nonconforming to requirements or which are lacking required documentation upon receipt will be controlled to prevent their inadvertent use or installation. It further requires that nonconforming items be identified and documented and, if accepted "as-is" or reworked to an acceptable condition, be identified through documentation records in a manner that will establish the condition as installed. Quality Procedure QP No. 15-1 implements the above requirements.

Contrary to the above:

- a. The licensee failed to establish and maintain documentation of material receipt inspection, identified conditions, and final disposition for nonconforming equipment included in Shipment No. 195 from Systems Control Corporation.
- b. Hatfield Electric Company (HECo) failed to establish and maintain documentation for nonconforming conditions identified and corrective action taken as a result of inspections performed pursuant to HECo QA/QC Memorandum No. 345.

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

2. Appendix B to 10 CFR Part 50, Criterion VII states, in part, "Measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. These measures shall include provisions, as appropriate for source evaluation and

selection,...." Commonwealth Edison Topical Report CE-1-A, Section 4, "Procurement Document Control," requires that prospective bidders for each specification be on the Approved Bidders List (ABL) and that where bids are obtained from prospective bidders from other than those listed on the ABL the bidders be evaluated and approved as acceptable prior to award. Edison Purchasing, based upon its evaluation of the bids and the purchase requisition and based upon review and approval of the bids by the Project Engineer and Quality Assurance, shall conduct necessary negotiations and clarifications and make the award to a bidder on the ABL.

Contrary to the above:

- a. The licensee purchased local instrument panels and main control boards and vertical panels from Systems Control Corporation (SCC) but SCC was not on the ABL as a supplier of that equipment.
- b. Safety-related equipment was procured from SCC after it had been removed from the ABL.

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

3. Appendix B to 10 CFR Part 50, Criterion XVI states, in part, "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected." Commonwealth Edison Topical Report CE-1-A, Section 16, "Corrective Action," requires that a corrective action system be used to assure that defective material and equipment are promptly identified and corrected and to provide followup to assure corrective measures are effective. Quality Procedure QP No. 16-1 implements the above requirements.

Contrary to the above, the licensee failed to take timely and effective actions to ensure deficiencies during the period May 1977 to February 1981 on cable pan hangers supplied by Systems Control Corporation were identified and corrected as evidenced by:

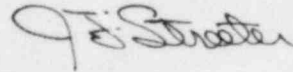
- a. The identification of deficiencies on at least 30 hangers in August 1982 and on at least 60 in August 1983.
- b. The identification of deficiencies in licensee audits, inspections by the electrical contractor, and a previous item of noncompliance issued by NRC Region III in December 1980.
- c. The resolution of NCRs F-850/F-885 failing to consider the possible affect of observed deficiencies (discrepant and/or missing welds) on the adequacy of the most highly stressed hanger connections in the plant.

This is a Severity Level IV violation (Supplement II) and is a repeat of Noncompliance Items No. 454/80-04-01; 455/80-04-01.

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 30 1984

Dated



J. F. Streeter, Director
Byron Project Division