

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-295

Docket No. 50-304

As a result of the inspection conducted on July 2 to August 1, and 29, 1984, and in accordance with the General Policy Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

1. Technical Specifications LCO 3.10.1.A states in part that, "Type A, B, and C tests of the containment shall be performed in accordance with the requirements of 10 CFR 50, Appendix J...."

Section III.A.3(a) of 10 CFR 50, Appendix J states in part that, "All Type A tests shall be conducted in accordance with the provisions of the American National Standard N45.4-1972."

Section 7.6 of ANSI N45.5-1972 requires that the test period be 24 hours unless it can be demonstrated to the satisfaction of those responsible for the acceptance of the containment structure that the leakage can be accurately determined during a shorter test period.

By letter from T. J. Rausch, Nuclear Licensing Administrator, Region III, Regional Administrator, dated September 2, 1984, to J. G. Keppler, Commonwealth Edison Company states that it "understands that the acceptable means of performing a less than 24 hour test is to use EN 1."

Contrary to the above on December 5, 1983 a Type A test of less than 24 hours was performed on Zion Unit 1 not in accordance with the requirements of BN-TOP-1.

This is a Severity Level IV violation (Supplement 1).

2. Technical Specifications LCO 3.10.1.A states in part that, "Type A, B, and C tests of the containment shall be performed in accordance with the requirements of 10 CFR 50, Appendix J.

Section III.A.3(b) of 10 CFR 50, Appendix J, states in part that, "The accuracy of any Type A test shall be verified by a supplemental test ...conducted for sufficient duration to establish accurately the change in leakage rate between the Type A and supplemental test." It also states, "If results are not within 0.25 La (or 0.25 Lt) the reason shall be determined, corrective action taken and a successful supplemental test performed."

Contrary to the above, the licensee:

- a. did not establish a valid reason for the failure of the first supplemental test performed following the Type A test of March 1981 and failed to perform a successful second supplemental test of

sufficient duration, without the need to arbitrarily post select the desired data sets, in order to establish the accuracy of the Type A test results.

- b. In December 1983, failed to obtain supplemental tests results within 0.25 Lt, determine the reason for this failure, take corrective action, and perform a satisfactory supplemental test following the Type A test.

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

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.

Sept 7, 1984
Dated

A Bert Davis
James G. Keppler
Regional Administrator