Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company Docket No. 50-454

As a result of the inspection conducted on October 2 through November 6, 1984, and in accordance with the General Policy and Procedure for NRC Enforcement Action, (10 CFR Part 2, Appendix C), the following violations were identified:

1. 10 CFR 50, Appendix XI, Test Control, as implemented by the Commonwealth Edison Quality Assurance Manual, Quality Requirement 11.0 and the Byron Startup Manual requires that test results be evaluated to assure conformance with design and performance requirements and that the data display the adequacy of the equipment to meet specified requirements.

   Contrary to the above, the following examples of inadequate evaluation of the results of preoperational test procedure SI 73.13, "Safety Injection-ECCS Check Valve Operability and Leakage", were identified.

   a. The licensee approved the results of retest R-248 with acceptance criterion 4.2 which allowed a leakage value in excess of that which would be required by proposed Technical Specification 3.4.6.2.f. (the Technical Specification has subsequently been approved).

   b. The licensee approved the results of leakage tests performed at a pressure less than the Reactor Coolant System pressure described in proposed Technical Specification 3.4.6.2.f. (or functional pressure) and failed to adjust the leakage to Reactor Coolant System pressure as described in the specification and in the ASME Code Section XI subsection IWV, "Valve Leak Rate Test". If the adjustment is applied to the test results, seven valves, 1SI 8956D, 1SI 8819A, 1SI 8819B, 1SI 8819C, 1SI 8819D, 1SI 8900A, and 1SI 8900B exceed 1.0 gpm leakage and hence would not satisfy Technical Specification 3.4.6.2.f.

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

2. 10 CFR 50, Appendix B, Criterion XI, Test Control, as implemented by the Commonwealth Edison Quality Assurance Manual, Quality Requirement 11.0 and the Byron Startup Manual requires that test results be evaluated to assure conformance with design and performance requirements and that the data display the adequacy of the equipment to meet specified requirements.

   10 CFR 50, Appendix B, Criterion XVI, Corrective Action requires that "measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Contrary to the above, the licensee did not adequately evaluate the pump curves of the Boric Acid Transfer Pumps and the Recycle Evaporator Feed Pumps from preoperational test AB 1.10, "Boric Acid," in that the suction pressure was not taken into consideration when determining total discharge head.

This was not discussed during any part of the test evaluation phase as documented in the completed test package at the station. A similar problem was identified previously by Inspection Report No. 50-454/84-16 dated April 17, 1984, with CECo taking corrective action and the action being fully implemented as of June 22, 1984.

The corrective action for 50-454/84-16-01 (examples 1 and 2) was inadequate to identify and correct the situation where incorrect pump curves were evaluated in preop test AB 1.10. The licensee has subsequently reperformed the evaluation using the correct curves and determined the pumps are adequate to fulfill their design function. The inspectors have reviewed these results and concur. Since the licensee's evaluation of AB 1.10 occurred prior to 50-454/84-16; the evaluation methodology and documentation process now specify attributes of pump performance analysis; and since no preoperational tests containing pumps remain to be reviewed, no response to this item of noncompliance is required.

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

3. 10 CFR 50, Appendix B, Criterion XI, Test Control, as implemented by the Commonwealth Edison Quality Assurance Manual, Quality Requirement 11.0 and the Byron Startup Manual requires that testing be performed to demonstrate that systems perform satisfactorily in service in accordance with the requirements contained in design documents.

Contrary to the above, sufficient testing was not performed on the Diesel Generator Fuel Oil System to ensure that the design basis of the Byron FSAR was verified. The design basis requires that sufficient diesel fuel oil be provided in the Diesel Oil Day Tank to allow the diesel generator to run for 72 minutes at full load. Although preoperational testing was originally performed to verify this design base, the data was invalidated by subsequent equipment modifications. The retesting which was required to be performed did not verify the design basis because of the use of a test method different than the original procedure. Based on the inspectors concerns, the licensee has performed additional testing to confirm that sufficient day tank storage capacity exists. Therefore adequate corrective actions have been taken and no response is required.

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

With respect to items 2 and 3, the inspection showed that action had been taken to correct the identified items of noncompliance and to prevent recurrence. Consequently, no reply to these items of noncompliance is required and we have no further questions regarding this matter. With respect to item 1, 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.

11/23/84
Dated

R. L. Spessard
R. L. Spessard, Director
Division of Reactor Safety