

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company
Byron 1 and 2

Docket Nos. 50-454 and 50-455
License Nos. NPF-37 and
CPPR-131

As a result of the inspection conducted from August 13, 1984 through April 2, 1985, and in accordance with the NRC Enforcement Policy, 47FR9987 (March 9, 1981), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, as implemented by CECo Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," and CECo Corporate Quality Assurance Manual, Nuclear Generating Stations, Quality Requirements, requires the licensee to accomplish safety-related activities in accordance with documented procedures.

NSP Procedure 3.0.9, Revision D, Paragraph 5.3 stated that "As-Built dimensions will be obtained by actual field measurement for all dimensions shown on the NPS-H-1000 series drawings."

Contrary to the above, NPS personnel only obtained by actual field measurements those dimensions which were checked to be questionable against the design and inspection documents. Some cognizant licensee personnel misunderstood the provisions of the procedure. (454/84-51-01; 455/84-35-01).

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

2. 10 CFR 50, Appendix B, Criterion III, as implemented by CECo Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," and CECo Corporate Quality Assurance Manual, Nuclear Generating Stations, Quality Requirements, requires measures be established to assure that applicable design bases for systems and components are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above:

- a. The bases for acceptance criteria for piping interaction (clearance) had not been formally established prior to implementation of the inspection procedures (454/84-51-02(a); 455/84-35-02(a)).
- b. Possible structural deformation due to rubbing within an energy absorbing material (EAM) enclosure had not been considered in the pipe whip restraint (WR) design (454/84-51-02(b); 455/84-35-02(b)).

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- c. EAM strength reduction due to excessive height to width ratio and due to stacking were not determined during the initial design stages (454/84-51-02(c); 455/84-35-02(c)).
- d. Possible interference between the EAM retaining box that could reduce the EAM crush strength during EAM deformation had not been evaluated for acceptance or tested for validation (454/84-51-02(d); 455/85-35-02(d)).

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

- 3. 10 CFR 50, Appendix B, Criterion V, as implemented by CECo Topical Report CE-1-A, "Quality Assurance Programs for Nuclear Generating Stations," and CECo Corporate Quality Assurance Manual, Nuclear Generating Stations, Quality Requirements, requires safety-related activities be prescribed by documented procedures which include appropriate quantitative or qualitative acceptance criteria.

Contrary to the above:

- a. The IE Bulletin 79-14 system walkdown procedure did not require measurements or estimates be made to establish the clearance between pipe and unsealed penetrations (454/84-51-03(a); 455/84-35-04(a)).
- b. Retesting of steam generator snubbers using Revision 1 of Procedure SPS-8471-7 was conducted prior to approval of Revision 1 (454/84-51-03(b); 455/84-35-04(b)).
- c. EAM was field cut without an approved procedure that included criteria for dimensional acceptance deviations and cautions not to remove the pre-crush (454/84-51-03(c); 455/84-35-04(c)).

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

- 4. 10 CFR 50, Appendix B, Criterion X, as implemented by CECo Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," and CECo Corporate Quality Assurance Manual, Nuclear Generating Stations, Quality Requirements, requires a program be established and implemented for inspection of activities affecting quality.

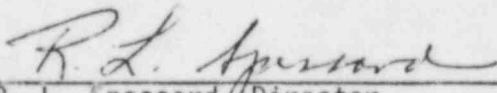
Contrary to the above, piping as-built dimension inspections failed to identify instances where the tolerances established by the Architect Engineer had been exceeded. Also, the efforts of walkdown personnel who had not been properly qualified prior to February 15, 1983, were not formally evaluated (454/84-51-04; 455/84-35-05).

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

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violation; (2) the reasons for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date:

4/3/85



R. L. Spessard, Director
Division of Reactor Safety