

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

Docket No. 50-455

As a result of the inspection conducted on August 1 - October 3, 1984, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion XI states, in part: "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents... Test results shall be documented and evaluated to assure that test requirements have been satisfied."

The Byron FSAR, Appendix A states, in part, that the licensee complies with the requirements of NRC Regulatory Guide 1.79, Revision 1, September 1975.

NRC Regulatory Guide 1.79, Revision 1, "Preoperational Testing of Emergency Core Cooling Systems for Pressurized Water Reactors", Regulatory Position C.2.b, "Valves" requires verification of proper operation of system valves including response times. Regulatory Guide 1.79 further states that this requires visual verification as well as proper control room indication.

Contrary to the above:

- a. For numerous Emergency Core Cooling System (ECCS) and other Engineered Safety Feature (ESF) valves, preoperational testing was not conducted to verify the accuracy of remote valve position indication used in ESF response time measurements to signify that valves completed stroking to the positions required to fulfill their safety function.
- b. Valve stroke time data for certain ECCS and other ESF valves which suggested inaccuracies in remote valve position indication was not adequately evaluated to determine the acceptability of ESF response time measurements.

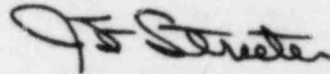
This is a Severity Level IV violation (Supplement II). (454/84-55-01; 455/84-38-01)

8412120073 641115
PDR ADOCK 05000454
G PDR

Appendix

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.

NOV 1 1988
Dated _____



J. F. Streeter, Director
Byron Project Division