

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-456  
Docket No. 50-457

As a result of the inspection conducted on December 10-20, 1984 and January 7-18, 1985, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified (Section references are to the detailed portion of Inspection Report No. 50-456/84-44, 50-457/84-40):

1. 10 CFR 50, Appendix B, Criterion VII as implemented by Commonwealth Edison Company's Quality Assurance Manual, Quality Requirement No. 7.0, requires that measures be established to assure that equipment and services conform to procurement documents.

Contrary to the above, at the time of this inspection the inspectors found:

- a. A number of vendor procured tanks and heat exchangers which had been accepted and installed with welds not in accordance with requirements of the vendor drawings. (Section IV.B.10.b) (456/84-44-01; 457/84-40-01)
- b. A number of vendor supplied radiographs which did not have the weld and film quality required by the vendor specifications. (Section IV.B.10.b) (456/84-44-02; 457/84-40-02)

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

2. 10 CFR 50, Appendix B, Criterion VIII as implemented by Commonwealth Edison Company's Quality Assurance Manual, Quality Requirement No. 8.0, requires that measures be established for the identification and control of materials.

Contrary to the above, at the time of this inspection the inspectors found that the licensee failed to implement measures to assure that purchased materials conformed to the procurement documents in that:

- a. Some of the 10,500 feet of General Electric "Vulkene" wire received at the Braidwood site had been installed without the appropriate qualification to IEEE 383-1974. (Section VI.B.1.b.(1)) (456/84-44-03; 457/84-40-03)
- b. Class 1E seismic cable tray hangers in the lower cable spreading room did not utilize ASTM A307 fasteners in some cases as required by Sargent & Lundy standard EB115. Also, the Class 1E battery racks

were found to have bolting material that did not meet the requirement of ASTM A307 as required by the generic qualification document. (Section VI.B.1.b.(2)) (456/84-44-04; 457/84-40-04)

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

3. 10 CFR 50, Appendix B, Criterion X as implemented by Commonwealth Edison Company's Quality assurance manual, Quality requirement No. 10.0, requires that a program for inspection of activities affecting quality be established and executed to verify conformance with design documents.

Contrary to the above, the inspectors found at the time of this inspection, that the licensee's inspection programs had:

- a. Not identified some areas where seismic Category I pipe supports/restraints and other seismic pipe supports/restraints were not constructed in accordance with design requirements as described in Table III-3 of the CAT Report. (Section III.B.2.b) (456/84-44-05; 457/84-40-05)
- b. Not provided an inspection program containing sufficient electrical separation acceptance criteria to verify that design requirements in this area had been met. (Section II.B.1.b(1)) (456/84-44-06; 457/84-40-06)
- c. Not identified some areas where weld sizes in structural pipe supports/restraints did not have the weld configuration required by the design as described in the Table IV-1 of the CAT Report. (Section IV.B.1.b(1)) (456/84-44-07; 457/84-40-07)

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

4. 10 CFR 50, Appendix B, Criterion XVI as implemented by Commonwealth Edison Company's Quality Assurance Manual, Quality Requirements No. 16.0, requires that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, at the time of this inspection, the inspectors found that the licensee electrical contractor's corrective actions for the following NCRs were inadequate:

- a. NCR 39, issued in April 1979, identified weld deficiencies in electrical struts and hangers. The supporting documentation attached to the NCR identified that 90 percent of the welds were unacceptable. The corrective action block on the NCR was marked "N/A" and contained a statement identifying the welds as acceptable. There was no documentation supporting this corrective action statement on the NCR. (Section V.II.B.1.b) (456/84-44-08; 457/84-40-08)

- b. NCR 293, issued in May 1981, identified weld deficiencies on back to back B-line strut and spaced back to back strut. The corrective action was to rework the deficient welds on the back to back strut and return the spaced back to back strut to the vendor. Inspection of installed spaced back to back strut identified numerous weld deficiencies. Based on the weld deficiencies noted in the installed strut, the corrective action for this NCR was ineffective. (Section VIII.B.1.b) (456/84-44-09; 457/84-40-09)

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

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.

April 11, 1985  
Dated

C. E. Norelius  
C. E. Norelius, Director  
Division of Reactor Projects