

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

Docket No. 50-374

As a result of the inspection conducted on September 19 through October 29, 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. Technical Specification 6.2.B states, "Radiation control procedures shall be maintained, made available to all station personnel, and adhered to." LaSalle Radiological Procedure LRP 1130-1 defines the specific wording for the signs required to be posted in an area where contamination levels exceed 1000 dpm/100 cm².

Contrary to the above, on October 24, 1984, the ladder from the 710' elevation to the 740' elevation was found not posted. The ladder provided access to the Unit 1 CRD changeout area on the 740' elevation which had been determined earlier to be contaminated to a level in excess of that required for posting as a controlled area.

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

2. Technical Specification 6.1.1.1 requires, in part, that in lieu of a "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 5000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by the security computer system.

Contrary to the above, the lower level of the Unit 1 reactor building where dose rates of a 150 mR/hr were possible to the whole body from the "B" residual heat removal suction header and drain line was not posted and the security computer had not been programmed to control access to the area.

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

3. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by documented instructions and procedures which include appropriate quantitative and qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, the following examples of failure to include appropriate instructions and acceptance criteria were identified:

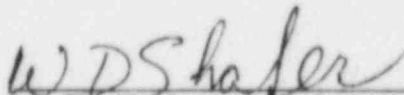
- a. The Maintenance/Modification procedure attached to Work Request (WR) L32527 did not provide instructions for the removal and installation of the stellite hinge pin bushings for the Unit 1 feedwater check valve 1B21-F010A during the February 1984 outage. Additionally, it did not specify acceptance criteria regarding the interference fit when the bushings were reinstalled in the valve disk. The lack of acceptance criteria for the interference fit of the bushings may have allowed a bushing with insufficient interference to be installed, resulting in the bushing moving out of the valve disk and preventing the disk from completely closing.
- b. The Maintenance/Modification procedures attached to WRs L29832, L29357, L32526, and L31910, performed during November 1983 through March 1984 for fabrication and installation of hinge pin bushings for Unit 1 and 2 feedwater check valves 1B21-F010A, 1B21-F010B, and 2B21-F010A, did not specify the acceptance criteria regarding the interference fit of the bushings in the valve disk. They also did not require dimensions to be recorded so that the interference fit could be determined.

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

With respect to items 1 and 2, 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 these matters. With respect to item 3, 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 28 1984

Dated _____


W. D. Shafer, Chief
Projects Branch 2