

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

Docket No. 50-374

As a result of the inspection conducted on December 18, 1984 through February 13, 1985, 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 specifications, Paragraph 6.2, invokes Regulatory Guide 1.33, Revision 2, including ANSI N18.7 (1976) which requires the licensee to have procedures for control of documents and changes thereto to preclude the possibility or use of outdated or inappropriate documents.

Contrary to the above, the inspector noted two examples of system modifications being installed without timely issue of updated operating procedures or drawings:

- a. The Reactor Core Isolation Cooling System was modified in November 1984 to autostart on low water level after shutdown. The licensee failed to issue revised system operating procedures until January 1985.
- b. The Reactor Feedwater System was modified during the fall 1984 outage to separate the power supplies and add a three second time delay for the low suction pressure trip of the feedwater pumps. The licensee failed to issue revised wiring drawings for the trip circuit which resulted in the incorrect installation of a jumper on February 8, 1985, which resulted in a reactor trip on loss of feedwater.

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

2. Facility Operating Licenses NPF-11 and NPF-18 require the licensee to maintain a fire protection program set forth in Appendix R to 10 CFR 50 as supplemented and amended by changes to the license and the Safety Evaluation Report. Licensee procedure LAP 900-22, which implements portions of the requirements of Appendix R to 10 CFR 50 and Regulatory Guide 1.120, requires that heat generating or heat source equipment must not be left unattended while it is warm enough to cause ignition of any surrounding combustible materials.

Contrary to the above, on January 24, 1985, the inspector found unattended portable electric space heaters in use in the "0" and "1B" diesel generator rooms.

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

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3. Technical specification 4.4.3.2.2 specifies the alarm setpoint with functional and calibration test frequency requirements for Reactor Coolant System leakage detection instrumentation. A channel functional test is required every 31 days and a channel calibration is required at least once per 18 months for the Residual Heat Removal (RHR) Shutdown Cooling High Pressure Monitor and the High Pressure Core Spray (HPCS) System alarm setpoints. Technical specification 6.2.A.7 requires procedures to be written for surveillance and testing requirements.

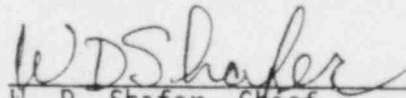
Contrary to the above, the high pressure leak detection monitoring switches for the RHR shutdown cooling piping were not functional tested every 31 days and no procedure to perform the function or calibration tests were issued. In addition, the procedure for the HPCS alarm setpoint (LIS-HP-03) specified a tolerance above the technical specification limit.

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

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.

FEB 26 1985

Dated _____



W. D. Shafer, Chief
Projects Branch 2