

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

Docket No. 50-374

As a result of the inspection conducted on August 12 through September 11, 1984, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. Technical Specification 3.6.1.8 states that with a drywell and/or suppression chamber purge supply and/or exhaust butterfly isolation valves open for other than inerting, deinerting, or pressure control, or not blocked to less than or equal to 50° open, close the butterfly valves within one hour or be in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours.

Contrary to the above, on August 12, 1984, a Limiting Condition for Operation was exceeded for Technical Specification 3.6.1.8 in that the reactor was not in cold shutdown within 24 hours after the initiation and continuing operation of the drywell purging system, for an activity other than inerting, deinerting, or pressure control.

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

2. Technical Specification 6.2A requires, in part, that detailed written procedures shall be adhered to for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Included in Appendix A of this Regulatory Guide are procedures for shift and relief turnover and log entries.

Contrary to the above, the following examples of failure to adhere to procedures were identified:

- a. On August 11, 1984, the Unit 2 reactor operator failed to adhere to the requirement contained in Procedure LAP 200-3, "Shift Change", in that no entry was made to the Degraded Equipment Log for operation of the Drywell Purge System while in the Action Statement of Technical Specification 3.6.1.8.
- b. On August 11-12, 1984, Unit 2 reactor operators for four subsequent shifts failed to adhere to the requirements contained in Procedure LAP 220-2, "Unit Operator's Log", in that no entries were made to the Unit Operator's Log for the startup and shutdown of the Drywell Purge System or for the continued operation of that system when it constituted an abnormal plant condition.

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

3. Technical Specification 6.2.A.7 requires, in part, that detailed written procedures be prepared, approved, and adhered to including responses to control room alarms.

LaSalle Procedure LAP 1600-2, "Conduct of Operations", Paragraph F.1.aa, requires the operators to know the reason for an annunciator which is in the alarmed condition while he is on duty. Also paragraph F.1.y requires the control room operator to be alert and attentive to control room instrumentation at all times and frequently monitor control room instrumentation and annunciator status to detect abnormalities and identify trends in important parameters.

Contrary to the above:

- a. A safety relief valve lifted twice which caused several annunciators, alarms, and parameter changes, and the operators did not determine that the valve lifted.
- b. The operator did not recognize the significance of two annunciators that came up as a result of surveillance testing on the reactor building ventilation and failure to clear the annunciator signal resulted in a reactor building ventilation isolation upon authorization for removal of a set of electrical jumpers.

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

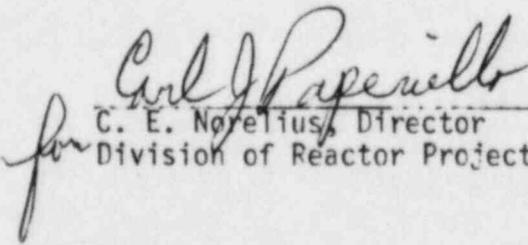
4. Technical Specification 6.2.A.7 requires, in part, that detailed written procedures be prepared, approved, and adhered to for surveillance and testing requirements.

- a. Contrary to the above, on August 25, 1984, during the performance of LIS-NB-09, the mechanic operated switch PS-1 B21-N045C when the ATWS control switch was aligned to the "TEST" position for switch PS-1 B21-N045A, which resulted in the trip of the 1B recirculation pump from 100% power.
- b. Contrary to the above, LES RP-102, "RPS Electric Power Monitoring Assembly Channel Functional Test by O.A.D.", was not adequate in that an electrical divisional crosstie was not recognized in the procedural review chain, resulting in two subsequent isolations of the reactor building ventilation system on August 24, 1984.

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

Date

10/4/84

for   
C. E. Novellius, Director  
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