

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

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As a result of the inspection conducted on November 4 through December 31, 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:

Technical Specification 4.0.3 states: "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Surveillance Requirements do not have to be performed on inoperable equipment." Technical Specification 4.0.5.b states, in part, that "Performance of ... inservice ... testing activities shall be in addition to other specified Surveillance Requirements." Technical Specification 4.0.5.a requires inservice testing of ASME Code Class 1, 2, and 3 pumps be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g).

Technical Specifications 3.9.8.2 (Mode 6), 3.4.1.4.1 and 3.4.1.4.2 (Mode 5) require at least one RHR loop to be OPERABLE.

Technical Specification 3.1.2.3 (Modes 5 and 6) requires one centrifugal charging pump to be OPERABLE.

Technical Specification 3.8.1.2 (Modes 5 and 6) requires a minimum of one diesel generator's associated fuel oil transfer pump to be OPERABLE.

Technical Specification 3.7.6 (Modes 5 and 6 prior to initial criticality on Cycle 1) requires one control room ventilation system to be OPERABLE.

Contrary to the above, pump OPERABILITY was not properly established by inservice testing as follows:

- a. RHR pumps were not inservice tested within the required surveillance intervals prior to entry into Modes 6 and 5.
- b. Suction pressure instrumentation used in inservice tests of the RHR pumps, centrifugal charging pumps, diesel oil transfer pumps, and control room chilled water pumps conducted prior to entry into Modes 6 and 5 exceeded maximum allowable range requirements.

This is a Severity Level IV violation (Supplement I)(454/84-79-01(DRP)).

Subsequent inservice testing demonstrated that the above pumps were capable of performing as designed, and that there had been degradation in pump performance.

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PDR ADOCK 05000454  
Q PDR

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.

1/30/85  
Dated

R. M. Larch for  
J. F. Streeter, Director  
Byron Project Division