

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

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

As a result of the inspection conducted on July 7 through August 31, 1984, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Commonwealth Edison Quality Assurance Manual requires in Q. P. No. 4-1 that bidders be approved and placed on the approved bidders list, that purchase orders be reviewed and accepted by the quality assurance department to assure that the necessary technical and quality requirements are included in the procurement documents, and that the procurement is being made from the plant location for which the Quality Assurance Program is approved.

Contrary to the above, on May 17, 1981 and July 9, 1981, Commonwealth Edison placed purchase order numbers 730091 and 254379, respectively, with an unapproved bidder that did not have an approved quality assurance program. The purchase orders were for the cleaning of 206,744 feet of safety-related piping, which was to be installed in ASME Section III, Class NC and ND systems and safety-related instrumentation piping systems. Furthermore, the purchase orders were not reviewed and accepted by the Commonwealth Edison Quality Assurance Department to assure that the necessary technical and quality requirements were addressed, and the purchase orders had no reference to quality assurance program requirements.

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

2. 10 CFR 50, Appendix B, Criterion XV, states in part: "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition, and notification to affected organizations."

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10 CFR 50, Appendix B, Criterion XVI, states in part: "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Contrary to the above, 337,350 feet of safety-related pipe was received in 1977 and rejected on April 9, 1979 due to rust, scale, and failure to cap the pipe ends. The pipe was not placed on hold to prevent withdrawal and installation in safety-related systems. As a result, some of the pipe was installed in the plant. In addition, the rejected pipe was not properly dispositioned in that only 206,744 feet of pipe was chemically cleaned.

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

3. 10 CFR 50, Appendix B, Criterion IX and the Commonwealth Edison Quality Assurance Manual state in part that measures shall be established to assure that special processes, including welding are controlled and accomplished by qualified personnel using qualified procedures.

Structural Steel Quality Control Procedure, Section 1, QAM and QC Procedure Control, Revision 3, and the Commonwealth Edison Quality Assurance Manual, Q. P. No. 5.1 require in part that quality procedures be approved for use by the architect engineer.

Piping Welding Procedure 1A-88-0, Revision 8, designated for use on drawing 1FT-426, Sheet 2, Revision B, requires the use of ER308 weld filler metal.

Contrary to the above:

- a. A quality structural steel, flux core welding procedure, 43GW-11 Revision 0, June 11, 1984, was not approved for use by the architect engineer, but was released for use in installation traveler Number 5832 by the structural steel contractor, and documented as being used for cover plate welds. Furthermore, the welder documented as performing the welding, was not qualified to utilize quality welding procedure 43GW-11, Revision 0, dated June 11, 1984.
- b. RPS Division Loop B, reactor coolant flow, completed socket weld joints, identified as FW21 and FW22 on drawing 1FT-426, Sheet 2, Revision B, have no piping records identifying the welder or weld filler metal utilized for the pipe-elbow connections.

This is a Severity Level V Violation (Supplement II).

With respect to Item 3, the inspection showed that action had been taken to correct the identified item of noncompliance and to prevent recurrence. Consequently, no reply to this item of noncompliance is required and we have no further questions regarding this matter.

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 except Item 3: (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.

OCT 16 1984
Dated

RF Warnick
R. F. Warnick, Chief
Projects Branch 1