

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

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As a result of the inspection conducted on May 14 through June 19, 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. 10 CFR 50 Appendix B, Criterion II, as implemented by Commonwealth Edison Company's Quality Assurance Program, Quality Requirement 2, commits to Regulatory Guide 1.28 which invokes the requirements of ANSI N45.2-1977 for the control of activities affecting quality.

ANSI N45.2, Section 7 states, in part, that measures shall be established to assure that documents are reviewed for adequacy to preclude the possibility of the use of inappropriate documents. ANSI N45.2, Section 12 states, in part, that test prerequisites include the condition of the item to be tested. ANSI N45.2, Section 15 states, in part, that measures shall be established to prevent inadvertent operation of systems and components.

Contrary to the above:

- a. Measures were not established to prevent inadvertent actuation of the Unit 2 Reactor Protection System (RPS) received on May 10, 1985 while in cold shutdown. The B RPS channel had a 1/2 scram signal due to troubleshooting the B Main Steam Line Radiation Monitor. Channel A of the RPS actuated due to lack of communication between the unit operator and the instrument mechanic on which Intermediate Range Monitor (IRM) should have been left bypassed.
- b. Testing prerequisites did not include the condition of the item to be tested, to prevent an inadvertent Group I Primary Containment Isolation System (PCIS) signal by Unit 2 on May 31, 1985. The Electro-Hydraulic Control (EHC) logic indicated main steam turbine speed of 1800 RPM, and the logic for the Group I isolation on low condenser vacuum was no longer bypassed. Thus, when the turbine reset button was pressed by the reactor operator, the Group I isolation occurred.
- c. Measures were not established to assure that documents were reviewed for adequacy of the test prerequisites regarding the condition of the item to be tested. This resulted in four inadvertent RPS scram signals on Unit 2:
 - (1) On June 4, 1985, the Source Range and Intermediate Range Neutron Monitoring Systems were being tested and the Reactor Mode Switch was placed in startup. The Control Rod Drive (CRD) System was shutdown at the time and the low CRD header pressure scram actuated.

- (2) On June 16, 1985, the Reactor Mode Switch was placed in startup with the Scram Discharge Volume (SDV) level above the scram setpoint.
- (3) On June 16, 1985, the Reactor Mode Switch was placed in run with the Main Steam Isolation Valves (MSIV) closed.
- (4) On June 7, 1985, while testing the RPS logic (LES-RP-02) a scram signal was received by lifting leads for testing of the backup scram circuitry.

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

2. Technical Specification 6.2.A.7 states that detailed written procedures "shall be prepared, approved and adhered to" for surveillance and testing requirements.

Contrary to the above, the procedure for performing the calibration of two Automatic Depressurization System actuation level switches on March 31, 1985 was not "adhered to", which allowed returning the inoperable B Trip System to service.

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

3. Title 10 to the Code of Federal Regulations (10 CFR), Part 50, Appendix B, Criterion III states, in part, "Measures shall be established for the identification and control of design interfaces, and for coordination among participating design organizations. These measures shall include the establishment of procedures among participating design organizations for the review, approval, release, distribution, and revision of documents involving design interfaces." The licensee implemented this requirement by Quality Assurance Manual Procedure Q.P. No. 3-51. Step C.6.C of Q.P. No. 3-51 requires the Station Nuclear Engineering Manager (SNEM) to "Prepare required detailed engineering design documents' necessary drawings plus establish quality requirements and other supporting documentation requirements."

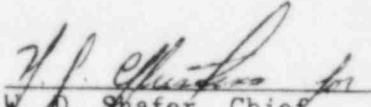
Contrary to the above, drawings which were issued to the site for the environmentally qualified switch replacement were issued with incorrect wiring, making the system B for ADS be inoperable which resulted in the Technical Specification 3.3.3 Limiting Condition for Operation to be exceeded.

This is a Severity Level IV 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.

JUL 18 1985

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Dated


W. D. Shafer, Chief
Reactor Projects Branch 2