

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

As a result of the inspection conducted on August 28-29, 1985, 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. Technical Specification 6.8.1.a. requires that applicable procedures for activities recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, be written, established, implemented and maintained. Section 7.a. of Appendix "A" of Regulatory Guide 1.33, Revision 2, specifies procedures for sampling, monitoring, and discharging effluents from the liquid radioactive waste system. Step F.1.c. of Byron Chemistry Procedure BCP 400-T50, Revision 3, for liquid radwaste releases requires verification/recording, by both the radwaste operator and the radwaste foreman prior to starting a release that the circulating water blowdown rate is equal to or greater than the minimum rate stated in Section C, Step 3, of the procedure. Item 4 of Section C, Prerequisites, of Byron Chemistry Surveillance Procedure OBCS 11.1.1.1-1, Revision 1, for radioactive liquid effluents state that the release tank shall be released with the circulating water blowdown system flow rate as specified in the Liquid Radwaste Release Tank Release Form, BCP 400-T50.

Contrary to the above, a ten minute, 2700 gallon, liquid radwaste release into the circulating water blowdown line was begun at 23:59 on August 22, 1985, without positive verification that circulating water blowdown flow rate existed to provide required dilution before release to an unrestricted area, due to a misunderstanding in a telecon between the radwaste operator in the radwaste control room who initiated the release and personnel in the reactor control room who provided information regarding the circulating water blowdown flow rate. The verification failure, in turn, resulted in a ten minute release to the blowdown line (and ultimately to the river) without circulating water blowdown flow rate required to provide dilution.

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

2. Technical Specification 3.11.1.1 states in part, "The concentration of radioactive material released in liquid effluents to unrestricted areas... shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2, for radionuclides other than dissolved or entrained noble gases. ...Applicability: at all times. Action: a. With the concentration of radioactive material released in Liquid effluents to unrestricted areas exceeding the above limits, immediately restore the concentration to within the above limits...."

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Contrary to the above, at 23:59 on August 22, 1985, a liquid radwaste release containing a mixture of radionuclides having a combined concentration of about 30 times the limit specified in 10 CFR Part 20, Appendix B, Table II, Column 2, was initiated from the radwaste release tank to the circulating water blowdown line without the intended 15,000 gpm circulating water blowdown flow rate to provide required dilution before release to an unrestricted area, and responsible personnel did not immediately restore the concentration to within the above limits. Although the effluent monitor on the circulating water blowdown line alarmed within one minute, the release continued for a total of 10 minutes before the monitor increase and alarm were considered valid and the release terminated.

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.

10-1-85
Dated

W.D.Shafer
W. D. Shafer, Chief
Emergency Preparedness and
Radiological Protection Branch