

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-456

As a result of the inspection conducted on May 20 through July 11, 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:

- A. 10 CFR 50, Appendix B, Criterion XI, "Test Control," as implemented by the Commonwealth Edison Quality Assurance Manual, Quality Requirement 11.0 and the Braidwood Startup Manual requires that testing to demonstrate that systems perform satisfactorily in service be performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in design documents.

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings", as implemented by Commonwealth Edison Company Quality Assurance Manual, Quality Requirement 5.0, requires that appropriate acceptance criteria be included in documents affecting quality to show that the activity has been completed satisfactorily.

Contrary to the above, sufficient testing and acceptance criteria were not incorporated in the Auxiliary Feedwater (AFW) system test procedure to ensure that the design basis of the Braidwood FSAR is verified. The design basis in question is verified by performing an AFW pump endurance run to ensure satisfactory bearing/bearing oil temperature and vibration and that pump room temperature and humidity remain within environmental qualification limits for safety related equipment. The preoperational test procedure does perform the pump endurance run for both AFW pumps, but does not require sufficient data to be taken or recorded and the acceptance criteria does not encompass all that is necessary to verify this design basis (456/85026-01(DRS)).

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

- B. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," as implemented by the Commonwealth Edison Quality Assurance Manual, Quality Requirement 16.0 and the Braidwood Startup Manual states, in part, "Measures shall be established to assure conditions adverse to quality such as... deficiencies...are promptly identified and corrected."

Contrary to the above,

1. A test deficiency was not written for the BWPT FC-10 preoperational test by the System Test Engineer to identify a deficient condition until directed by the Test Review Board (456/85026-02a(DRS)).

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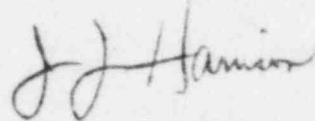
2. The description of the deficient condition was inadequate to properly define the problem that test deficiency FC-10-K was initiated to correct in that the deficient condition involved both writing and verifying procedures while the description only addressed writing procedures (456/85026-02b(DRS)).
3. Corrective actions taken to resolve deficient conditions were not adequate to close test deficiencies: for FC-10-K, the deficiency itself was closed even though the deficient condition had not been corrected; for DO-12-80, no documentation of the verification of procedures existed; and for RH-10-123, the deficiency was closed with temporary equipment installed (456/85026-02c(DRS)).

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

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 violation: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

AUG 12 1985

Dated _____



J. J. Harrison, Chief
Engineering Branch