Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-265

As a result of the inspection conducted on July 8 through 19, 1985, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion V, as implemented by the CECo Quality Assurance Manual (Q.R. No. 5.0 and Q.P.-No. 5-51), states, in part, that activities affecting quality shall be prescribed by appropriate written procedures. Contrary to this, a number of procedures were identified in which the instructions or the data sheets were inappropriate for performing the required test.

- a. Procedure QTS 1512-1, "Nuclear Engineer's Method for APRM Calibration," required form QTS 1512-51 to be completed as part of the test performed on June 6, 1985. This form was inappropriate in that it did not indicate the person who performed the test or specify the date and Unit (1 or 2) on which the test was performed (265/85023-01a(DRS)).
- b. Procedure QOS 700-6, "APRM High Flux (Heat Balance) Calibration Test," required form QOS 700-S4 to be completed with the use of the nomograph QOS 700-S6 to perform a hand heat balance calculation. This method was inadequate due to the complexity of the instructions and the inaccuracies of the nomograph (265/85023-01b(DRS)).
- c. Procedure QTS 130-1, "Control Rod Timing and Position Indication Check," required data sheet QTS 130-S1 to be completed as part of the test performed subsequent to core load. This procedure was inadequate in that it did not clearly state that the verification of rod position indication, as required by Technical Specifications, should be documented on the data sheet and hence this verification was not recorded (265/85023-01c(DRS)).
- d. Procedure QTP 1106-2, "Initial In-Sequence Criticality Estimate Evaluation," required form QTP 1106-S3 to be completed as part of the test performed on June 5, 1985. This procedure and data sheet were inappropriate in that only the results of the calculation were required to be recorded on the data sheet; an approved method for the initial criticality evaluation was not specified (265/85023-01d(DRS)).
- e. Procedure QTP 1600-3, "Flow Control Line Determination," required data sheet QTP 1600-S8 to be completed as part of the test performed on June 14, 1985. This data sheet was inappropriate in that it did not indicate the person who performed the test or specify the date and Unit (1 or 2) on which the test was performed (265/85023-01e(DRS)).

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This is a Severity Level V 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.

AUG 1 3 1985

Dated

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J. J. Harrison, Chief Engineering Branch