

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373
Docket No. 50-374

As a result of the inspection conducted on December 1 through January 6, 1988, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1985), the following violation, with two examples, was identified:

Technical Specification 6.2.A requires that detailed written procedures including applicable checkoff lists shall be prepared, approved, and adhered to for the following:

1. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33 includes surveillance and testing procedures.
2. Emergency conditions involving potential or actual release of radioactivity-"Generating Station Emergency Plan" and station emergency and abnormal procedures.

10 CFR 50.72, b.2.iii D, "Four Hour Reports," requires the licensee to notify the NRC within four hours of the occurrence of "Any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident."

Emergency procedure LZP-1310-1, "Notifications," step F.2.b.3)c), states, in part, "Non emergency events Four Hour Reports any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to (4) mitigate the consequences of an accident".

Surveillance procedure LOS-RI-Q3, "Reactor Core Isolation Cooling (RCIC) System Pump Operability and Valve Inservice Tests," step F.11.b, states, "Open both RCIC full flow test return to CST valves 2E51-F022 and 2E51-F059".

Contrary to the above, the licensee failed to follow a surveillance procedure and an emergency procedure in the following instances.

- A. On December 1, 1987, during the testing of the RCIC turbine and system, the operator failed to open the RCIC full flow test return to CST valve 2E51-F022 per the procedure LOS-RI-Q3. This resulted in a RCIC turbine trip on overspeed while performing the test.
- B. On December 16, 1987, the RCIC keep fill pump seized up causing the RCIC system to become inoperable. This is a non-emergency reportable event with a four hour notification to the NRC. The licensee did not report the event in accordance with Emergency Procedure LZP-1310-1 within four hours. The event was not reported until approximately 19 hours after its occurrence.

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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 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.

Dated

William L. Forney
W. L. Forney, Chief
Reactor Projects Branch 1