

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison
Company

Docket No. 50-454
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Based on the results of the NRC inspection conducted on August 8-10, 1978, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. This item is a deficiency.

10 CFR 50, Appendix B, Criterion V states, in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings"; the Byron Units 1 and 2 PSAR Chapter 17.1.5 states, in part: "Activities affecting quality are required . . . to be prescribed by documented instructions, procedures . . ."; the Commonwealth Edison Topical Report CE-1-A, Revision 4, Section 5 states, in part: "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, specifications . . ."; the same Topical Report page 2-2 commits to Regulatory Guide 1.58, 8-73 which indicates that the qualification requirements delineated in ANSI N45.2.6-1973 are applicable during construction phase of nuclear power plants; also the Topical Report page 2-5 states, in part: "Qualification and certifications will be maintained in a current status and will be established to meet the application requirements of . . . ANSI Standard N45.2.6 . . . contractor personnel engaged in inspection . . . will be required to be trained, qualified and certified . . . in accordance with the above requirements." ANSI N45.2.6-1973, Section 1.3 states, in part: "It is the responsibility of the organization performing these activities to specify the detailed methods and procedures unless they are specified in the contract documents."

Contrary to the above, the inspector observed that at least two site contractors failed to prescribe in CECO approved documented instructions or procedures how they intend to comply with all of the requirements of ANSI N45.2.6-1973; for example:

1. The site electrical contractor, Hatfield Electric Company (HECo), failed to delineate in a CECO approved procedure how they intend to comply with ANSI N45.2.6-1973 Sections 3, 3.1, and 3.2.1 - which addresses Qualifications, levels of capability and physical capabilities.

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2. Reliable Sheet Metal Works Inc., a contractor responsible for installation/inspection of safety-related HVAC systems/components, failed to prescribe in a CECO approved documented instruction the experience required for quality assurance/inspection personnel (reference ANSI N45.2.6-1973 Section 3).