

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

As a result of the inspection conducted on March 24 through April 25, 1988, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1987), the following violation was identified:

Technical Specifications, Section 6.2.A.1, states in part, that written procedures shall be prepared, approved, and adhered to covering activities referenced in Appendix A, of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Part 1.g. and 1.h. requires procedures to be written covering shift and relief turnover and log entries.

Contrary to the above, the following procedures were not adhered to:

- Procedure, LAP-200-3, "Shift Change," Revision 15, Part F.1. requires both the off-going and on-coming Shift Engineers review the Degraded Equipment Log (DEL) and Part F.2 requires the on-coming Shift Control Room Engineer (SCRE) review and discuss the DEL with the off-going SCRE. However, two Intermediate Range Monitors (IRMs) on the same trip system were listed as inoperable in the DEL, leaving two operable on that trip system which is one less than required in Mode 5, per Technical Specification 3.3.1. None of the required shift change reviews identified this for eight days, from March 17 through 25, 1988.
- Procedure, LAP-200-3 also requires in Step F.1.d.3) the off-going Shift Engineer log in the Shift Engineer's Log any equipment which is in a degraded mode and/or may require further action. However, 'D' IRM which was declared inoperable on March 13 was not so logged in the Shift Engineer's Log.
- Procedure, LAP-220-4, "Degraded Equipment Log," Revision 2, Step F.4.a.1) requires the Operating Engineer to review the DEL weekly to ensure, in part, that Technical Specification requirements are being met. However, two IRMs were listed in the DEL as being inoperable from March 17-25, which did not comply with Technical Specification 3.3.1.
- Procedure, LAP-220-4 requires in Step F.4.a.2) that the Operating Engineer document his weekly review of the DEL by making a line entry in the DEL following the last degraded equipment entry. However, during the period of interest the Operating Engineer signed that he reviewed the DEL on March 11 and 25, thereby missing one week.

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.

April 29, 1988
Dated

M J Forda for
Geoffrey C. Wright, Chief
Operations Branch