

## NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-295

Docket No. 50-304

As a result of the inspection conducted on November 19, 1985 through January 3, 1986, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality . . . are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Contrary to the above, on March 14, 1983, a condition adverse to quality, a loss of decay heat removal event, occurred on Unit 2, and the licensee failed to assure that corrective action was taken to preclude repetition, as indicated by a similar event on Unit 1 on December 14, 1985.

This is a Severity Level IV violation (Supplement I).

2. 10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances. . . . Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above:

- a. Procedure MI-6, "Filling and Draining the Refueling Cavity and Fuel Transfer Canal" was inappropriate to the circumstances in that it failed to provide periodic checks between reactor vessel level indicating system recorders and tygon level indication while the reactor coolant system loop was in the partially drained condition.
- b. Procedure MI-6, step 6.34, failed to include appropriate quantitative or qualitative acceptance criteria for determining that the comparison between reactor vessel level indicating system recorders and tygon level was satisfactorily accomplished.
- c. Procedure MI-6 was inappropriate to the circumstances in that it failed to contain a caution stating that the refueling vessel level recorders will not indicate below 584' 5", and that tygon level indication should be used exclusively if level is to be held at or below 584' 5".

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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.

February 10, 1986

Dated

*Charles E. Norelius*

Charles E. Norelius, Director,  
Division of Reactor Projects