

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

As a result of the inspection conducted on January 1-31, 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. Technical Specification 4.0.2 states, in part: "Each surveillance requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval..."

Technical Specification 4.0.3 states, in part: "Failure to perform a surveillance requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation...."

Technical Specification 4.3.3.6 states: "Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7."

Table 4.3-7, Instrument 1, "Containment Pressure" requires that a CHANNEL CHECK be performed at least once every month and that a CHANNEL CALIBRATION be performed at least once every 18 months.

Technical Specification 3.3.3.6 states: "The accident monitoring instrumentation channels shown in Table 3.3-10 shall be operable."

Technical Specification 3.3.3.6.b states, in part: "With the number of OPERABLE accident monitoring instrumentation channels...less than the minimum channels OPERABLE requirements of Table 3.3-10, restore the inoperable channel(s) to OPERABLE status within 48 hours; otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours."

Table 3.3-10, Instrument 1, "Containment Pressure" requires a minimum channels operable of one. There are two Containment Pressure Accident Monitoring Channels, designated PC004 and PC005.

Contrary to the above:

- a. During the period of January to November, 1985, while in Modes 1, 2, and 3, the monthly interval for a CHANNEL CHECK of the Post Accident Monitoring Containment Pressure Channels PC004 and PC005 was exceeded in that no channel check was performed during this time.

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- b. On July 7 and 8, 1985, while in Mode 1, the 18 month intervals for a CHANNEL CALIBRATION of the Post Accident Monitoring Containment Pressure Channels PC004 and PC005, respectively, were exceeded. The calibration was subsequently performed on December 9, 1985.
- c. During the period of January to November, 1985, while in Modes 1, 2, and 3, with both Containment Pressure Accident Monitoring Channels PC004 and PC005 inoperable in excess of 48 hours, action was not taken to place the unit in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

This is a Severity Level IV violation (Supplement I). (454/86002-01(DRP))

- 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 and shall be accomplished in accordance with these instructions, procedures, or drawings...."

Byron Operating Surveillance 1BOS 3.1.1-20, "Train A Solid State Protection System Bi-Monthly Surveillance", Paragraph F.45 states: "At the logic test panel, PLACE the INPUT ERROR INHIBIT switch to the INHIBIT position", and requires "INDEPENDENT VERIFICATION" of this step.

Byron Administrative Procedure BAP 100-13, "Guidelines for Performance of Independent Verification of Proper Equipment Alignment", Paragraph C.1 states, in part: "All Components that provide a safety function should be independently verified when alignment changes have been made."

BAP 100-13, Paragraph C.9 states: "Independent verification may also be satisfied by a visual verification, apart in time, and documentation of equipment alignment by a second qualified person."

Contrary to the above:

- a. On December 8, 1985, while in Mode 5, a licensed operator performing surveillance 1BOS 3.1.1-20 failed to place the INPUT ERROR INHIBIT switch in the INHIBIT position, resulting in a Safety Injection.
- b. During the performance of 1BOS 3.1.1-200, on December 8, 1985, the licensee failed to ensure that the Independent Verification Program was effectively implemented .

This is a Severity Level V violation (Supplement I). (454/86002-02(DRP))

- 3. 10 CFR 50, Appendix B, Criterion XVI states, in part: "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances 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..."

ANSI N18.7-1976/ANS-3.2, is endorsed by Regulatory Guide 1.33, Revision 2. Regulatory Guide 1.33, Revision 2 is committed to in the Byron FSAR, Appendix A.

ANSI N18.7-1976/ANS-3.2, Section 5.2.11 states, in part: "...In the case of significant conditions adverse to safety, the measures shall assure that the cause of the condition is determined and corrective action taken shall be documented..."

On June 26, 1985 a surveillance was performed on Steam Flow Channel 522 for the 1B Steam Generator Feedwater Regulating Valve (FRV) control circuit using Byron Instrument Surveillance 1BIS 3.2.1-200, "Surveillance Calibration of the Steam Generator Steam Flow/Feed Flow Mismatch Protection Set I". During the performance of this surveillance Channel 522 was placed in test while it was still selected to control the FRV; the licensed operator was forced to take manual control of the FRV to prevent a reactor trip. The placing in test of a channel used to control an important plant parameter was a significant condition which was adverse to safety. This fact was documented and corrective actions defined in Deviation Report (DVR) 6-1-85-194.

Contrary to the above, the Licensee failed to complete the corrective actions identified in DVR 6-1-85-194 in June 1985, prior to performance of maintenance on channel 522 on December 27, 1985. Failure to perform the required corrective actions resulted in a reactor trip.

This is a Severity Level IV Violation (Supplement I). (454/86002-03(D&P))

4. Technical Specification 4.6.3.1 states: "The isolation valves specified in Table 3.6-1 shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test, and verification of isolation time."

Table 3.6-1, Section 7, lists 1FW039D as a Feedwater Containment Isolation valve.

Technical Specification 3.6.3 states, in part: "The containment isolation valves specified in Table 3.6-1 shall be OPERABLE...", while in Modes 1, 2, 3, and 4.

Technical Specification 3.6.3.a states, in part: "With one or more of the isolation valve(s) specified in Table 3.6-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and within four hours...Restore the inoperable valve(s) to OPERABLE status, or isolate each affected penetration by the use of at least one deactivated automatic valve secured in the isolation position...Otherwise, be in at least HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours..."

Contrary to the above:

- a. On December 13, 1985, while in Mode 5, containment isolation valve 1FW039D was returned to service prior to performance of an isolation time test, required to verify valve operability.
- b. During the period of December 13 to 31, 1985, while in Modes 1, 2, 3, and 4, with 1FW039D inoperable for greater than 4 hours and not deactivated, action was not taken to place the unit in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

This is a Severity Level IV Violation (Supplement I). (454/86002-04(DRP))

With respect to Item 1, the inspection showed that action had been taken to correct the identified violation and to prevent recurrence. Consequently, no reply to the violation is required and we have no further questions regarding this matter. With respect to Items 2, 3, and 4, 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.

FEB 20 1986

Dated \_\_\_\_\_

R. F. Warnick  
R. F. Warnick, Chief  
Reactor Projects Branch 1