NOTICE OF VIOLATION

Commonwealth Edison Company Docket Nos. 50-454; 50-455

As a result of the inspection conducted from April 1 through May 16, 1988, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the following violations were identified:

1. A. 10 CFR 50, Appendix B, Criterion III, as implemented by Commonwealth Edison Company's Quality Assurance Manual, Quality Requirement 3.0, requires that measures shall be established to assure that the applicable design basis is correctly translated into specifications, drawings, procedures and instructions. Quality Procedure QP 3-51, paragraph C.28.d requires that all procedures necessary for system operation are completed prior to placing modified equipment in operation.

Post Fuel Load Engineering Change Notice (PECN) P-155-1 described a revision to the design of modification M6-1-85-0049 and was transmitted via a letter from Sargent & Lundy (Architect/Engineer for Byron) to R. E. Querio, dated June 17, 1986. PECN P-155-1 changed the position of valves 1RY087A and 1RY087B from open to locked open.

Byron Administrative Procedure BAP 330-3, "Locked Equipment Program," defines the licensee's program for locking equipment. BAP 330-A1, "Safety Related Locked Valves," lists all valves which are required to be locked. Byron Operating Procedure BOP RY-M1, Revision 5, "Reactor Coolant Pressurizer (RY) System Valve Lineup," defines the normal positions of valves in the RY system.

Contrary to the above, from May 8, 1987 through April 13, 1988:

(1) Procedure BAP 330-A1 had not been revised to include valves 1RY087A and 1RY087B.

(2) Procedure BOP RY-M1 had not been revised to indicate that the normal position of valves 1RY087A and 1RY087B was locked open.

B. 10 CFR 50.55a(a)(2) requires that systems and components of pressurized water-cooled nuclear power reactors must be constructed in accordance with the applicable edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) as described in 10 CFR 50.55a(b).

10 CFR 50.55a(g)(4) requires that throughout the service life of a pressurized water-cooled nuclear power reactor, components which are repaired or replaced and are classified as ASME Code Class 3 shall meet the requirements set forth in Section XI of the ASME Code and its addenda that are effective as described in 10 CFR 50.55a(g)(3).

To implement these requirements the licensee has committed to the 1974 Edition, Summer 1975 Addenda, of the ASME Code, for Section III (construction) activities and to the 1980 Edition, Winter 1981 Addenda, of the ASME Code for Section XI (repair and replacement) activities.

ASME Code, Section XI, Division I, Article IWA-7210, paragraph a, 1980 Edition, Winter 1981 Addenda, requires that replacement components shall meet the requirements of the Construction Code to which the original component was built.

ASME Code, Section III, Division 1, Article ND-7100, 1974 Edition, Summer 1975 Addenda, requires that Class 3 components be protected from the consequences of overpressure conditions which are in excess of the system's design. Article ND-7153 requires that no stop valves (isolation valves) be located between the safety valve (overpressure protection device) and the system it is to protect, unless such stop valves are constructed and installed with positive controls and interlocks so that the relieving capacity of the safety valve is met under all conditions of operation. Measures shall be provided to verify the operability of the positive controls and interlocks by testing.

Safety valves 1RY030A, 1RY030B, 2RY030A, and 2RY030B are designated as ASME Code Class 3 and provide overpressure protection for accumulators (pressure vessels) 1RY32MA, 1RY32MB, 2RY32MA, and 2RY32MB, respectively. Manual isolation (stop) valves 1RY087A, 1RY087B, 2RY087A, and 2RY087B are located between their respective safety valves and accumulators.

Contrary to the above:

(1) From May 8, 1987 through April 13, 1988, positive controls and interlocks were not utilized on valves 1RY087A and 1RY087B to prevent their inadvertent closure.

(2) From November 6, 1986 through April 13, 1988, positive controls and interlocks were not utilized on valves 2RY087A and 2RY087B to prevent their inadvertent closure.

These two violations are considered a Severity Level IV problem in the aggregate (Supplement I). (454/88007-01(DRP); 455/88007-02(DRP))

2. 10 CFR 50, Appendix B, Criterion XI, as implemented by Commonwealth Edison Company's Quality Assurance Manual, Quality Requirement 11.0, requires that a test program be established to assure that all testing required to demonstrate that systems and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

A letter from the project engineering department (PED) to Byron Station (letter from D. Elias to R. E. Querio, dated December 23, 1986), stated that the accumulators should be verified to pressurize with needle valves 1RY092A and 1RY092B fully open; or else the valves should be throttled as required to allow the accumulators to pressurize, and then the valves should be secured in place.

Contrary to the above:

a. On April 21, 1987, post-modification test M6-1-85-0049 failed to incorporate PED's recommended testing of valves 1RY092A and 1RY092B.

b. On April 21, 1987, post-modification test M6-1-85-0049 failed to verify that the piping upstream of check valves 1RY092A, 1RY092B, 1RY093A, and 1RY093B was depressurized prior to performing a leakage test of these check valves.

This is a Severity Level IV violation (Supplement I). (454/88007-02(DRP))

3. 10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Company's Quality Assurance Manual, Quality Requirement 5.0, requires that activities affecting quality shall be prescribed and accomplished in accordance with documented instructions and procedures.

Byron Administrative Procedure BAP 1100-7, "Fire Prevention for Use of Lumber and other Combustibles," implements this requirement and defines the licensee's program for controlling combustible material such as cotton rags. Paragraph C.8 requires that in safety-related areas excess combustible material be removed at the end of a shift. Additionally, excess material may remain in an area provided the area is not left unattended.

Contrary to the above, on April 27, 1988, at location L-15 on the 383' elevation in the auxiliary building, combustible material (clean cotton rags) were observed in and immediately below safety-related cable tray 1684B C1E, with no personnel in the area.

This is a Severity Level V violation (Supplement I). (454/88007-03(DRP))

With respect to item 3, 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 1 and 2, 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.

5/27/88
Dated

W. L. Forney, Chief
Reactor Projects Branch 1