

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-455

As a result of the inspection conducted on January 16 through March 17, 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. The Byron FSAR, Appendix A commits to Regulatory Guide 1.39, Revision 2. Regulatory Guide 1.39, Revision 2 endorses ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants".

ANSI N45.2.3-1973, Section 2.1 requires that cleanliness requirements for housekeeping activities shall be established on the basis of five different zones (levels) of cleanliness. Cleanliness Zone II is an intermediate cleanliness area where foreign matter may have detrimental effects and requires the use of clean gloves, shoe covers, head covering, material accountability, personnel accountability, and no use of tobacco or eating.

Contrary to the above, on February 23, 1986, during the performance of preoperational test EF 2.26.61, "ECCS Full Flow" six individuals (three of whom were supervisors) were observed to be in the Level II Cleanliness Zone at the Containment ECCS Recirculation Sumps and were not wearing the required protective clothing (clean gloves and head coverings).

This is a Severity Level V violation (Supplement II). (455/86004-01(DRP))

2. 10 CFR 50, Appendix B, Criterion V, as implemented by the Commonwealth Edison Company's Quality Assurance Manual, Quality Requirement 5.0 requires that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and that these activities shall be accomplished in accordance with the specified instructions.

Byron Administrative Procedure BAP 330-2, "Temporary Alterations" implements these requirements and prescribes the administrative controls for the use of temporary alteration to all plant systems. Paragraph C.1.a(1) defines a temporary mechanical alteration as a temporary connection such as a hose, tubing or piping which joins two systems together. Paragraph C.3 prescribes the actions to remove an installed Temporary Alteration. These include: 1) Shift Engineer's approval to remove the Temporary Alteration; 2) the removing individual obtains the original of BAP 330-2T1, "Temporary Alteration Log Sheet", removes the Temporary Alteration and its tags, signs the original of BAP 330-2T1 and hand carries the original of BAP 330-2T1 and the tags to the control room supervisor; 3) an independent verification is then made that the Temporary Alteration has been properly removed and that the original of BAP 330-2T1 is signed to indicate this.

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Contrary to the above, on January 17, 1986, Temporary Mechanical Alteration 85-0-259 was removed without: 1) obtaining the Shift Engineer's approval to remove the Temporary Alteration; 2) the removing individual obtaining the original of BAP 330-2T1; the removing individual did not remove the Temporary Mechanical Alteration tag, nor sign the original of BAP 330-2T1, nor hand carry the original of BAP 330-2T1 and the tag to the control room supervisor; and 3) an independent verification was not made that the Temporary Alteration had been properly removed and that the log sheet was signed to indicate this.

This is a Severity Level V violation (Supplement II). (455/86004-02(DRP))

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.

APR 03 1986

Dated

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