

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-456
Docket No. 50-457

As a result of the inspection conducted on October 16, 1987 through January 12, 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. 10 CFR Part 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Quality Assurance Manual states in part that activities affecting quality shall be performed by a procedure appropriate to the circumstances.

Contrary to the above, on July 2, 1987, the System Test Engineer in charge of BwPT RY-50 did not use an appropriate procedure to troubleshoot power operated relief valve (PORV) 2RY455A in that the PORV's block valve was not verified closed prior to commencing the troubleshooting which led to depressurization of the reactor coolant system. (457/87039-01(DRS))

This is a Severity Level V violation (Supplement II).

2. 10 CFR Part 50, Appendix B, Criterion V states that activities affecting quality shall be prescribed by documented procedures or instructions and shall be accomplished in accordance with those procedures or instructions. Braidwood Startup Manual, Section 6.3.7, requires deficient conditions be recorded as deficiencies by the end of the testing day.

Contrary to the above, the following examples of late or non-existent deficiency reports were identified:

- a. Test Change Request #27 was incorporated into BwPT RY-50 on August 19, 1987, which changed the expected opening range of the Power Operated Relief Valves (PORV) and in turn produced a deficient condition in that the computer points data associated with the PORV was now out of the expected range. No deficiency was initiated. (457/87039-06a(DRS))
- b. On January 13, 1987, BwPT AB-50, Step 9.1.12, recorded the Boric Acid Transfer Pump 2 discharge pressure and flow rate to be out of their expected range; however, a deficiency was not initiated until January 30, 1987. (457/87039-06b(DRS))
- c. On December 6, 1986, BwSU PI-30, Appendix A2, Step A1.40, recorded the voltage for the PS2 power supply as being out of the expected range; however, a deficiency was not initiated until April 29, 1987. (456/87041-04(DRS))

This is a Severity Level V violation (Supplement I and II).

3. 10 CFR Part 50, Appendix B, Criterion VI, as implemented by Commonwealth Edison Quality Assurance Manual states that procedures shall be reviewed for adequacy.

Contrary to the above, the following examples were identified:

- a. Preoperational Test BwPT RC-52 was reviewed and approved on January 12, 1987, despite the steps designated to satisfy acceptance criterion 4.4 being incorrect to prove the Residual Heat Removal suction valve interlock would respond properly to high reactor coolant pressure. (457/87039-12a(DRS))
- b. Startup Test Bwsu NR-79 was reviewed and approved on November 10, 1987, for Unit 2 testing activities despite an inadequacy at test step 9.1.16 that, had the procedure been conducted as written, would have directed the opening of incorrect switchyard circuit breakers with the result being an inadvertent trip of the Unit 1 main generator. (457/87039-12b(DRS))

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

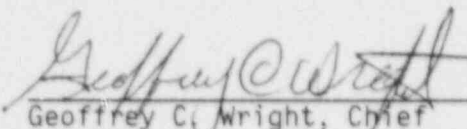
4. Operating License NPF-72, Section 2.C.(4) requires the licensee to notify the NRC in accordance with 10 CFR 50.59 of any change to the Initial Startup Test Program within 30 days.

Contrary to the above, on January 13, 1987, the licensee issued Test Change Request #4 to Bwsu RD-30 which changed the Initial Startup Test Program by allowing the test to be performed with one reactor coolant pump operating while FSAR Table 14.2-63 required no pumps operating. The licensee did not notify the NRC until six months later by a letter dated July 22, 1987. (456/87041-06(DRS))

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

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.

Dated



Geoffrey C. Wright, Chief
Operations Branch