

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-454

As a result of the inspection conducted on February 1-28, 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 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.

10 CFR 50, Appendix B, Criterion XVI, as implemented by the Commonwealth Edison Company's Quality Assurance Manual, Quality Requirement 16.0, requires that measures shall be established to assure that conditions adverse to quality, such as malfunctions, deficiencies, and deviations 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 actions shall be taken to preclude repetition.

ANSI N18.7-1976/ANS-3.2, "Quality Assurance for the Operational Phase of Nuclear Power Plants" is endorsed by Regulatory Guide 1.33, Revision 2. Regulatory Guide 1.33, Revision 2 is committed to in Appendix A of the Byron FSAR. Section 5.2.11 of ANSI N18.7-1976/ANS-3.2, requires that conditions adverse to plant safety, such as malfunctions, deficiencies, and deviations are promptly identified and corrected. 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 and reported to appropriate levels of management.

Contrary to the above:

- a. On January 16, 1986, licensee personnel performed a Shunt Trip test of Reactor Trip Breaker B using procedure 1BOS 3.1.1-11 "Bi-monthly Staggered Basis Reactor Trip Breaker Shunt and Undervoltage Trip Independence Test-Train B," Temporary Change No. 85-1-925. The procedure was not appropriate to the circumstances in that the procedure failed to explicitly specify the location of the Trip Pushbuttons for Train A and Train B in Rod Control Switchgear 1RD05E, which resulted in a reactor trip.

On August 7, 1985 a reactor trip occurred when an individual disconnected a signal cable from the back of the wrong Power Range Nuclear Instrument cabinet. The licensee's investigation of this event determined that it was caused by an inadequately descriptive procedure (the correct NI cabinet was not specified), inadequate labeling of the signal cables and Nuclear Instrumentation cabinets, and having identical locks on the cabinet doors. Corrective actions included revising the Nuclear Instrument Surveillance Procedures to

specify the correct cabinet, to label the signal cables, to label the backs of the Nuclear Instrumentation cabinets, and to place unique locks on each cabinet of the Reactor Protection System. These actions were documented in LER 454/85078.

- b. Between August 7, 1985, and January 16, 1986, licensee management failed to assure that the corrective actions identified in LER 454/85078, for a significant condition which was adverse to quality and safety were accomplished in a timely and effective manner for all components in the Reactor Protection System, in that: (1) the identical Shunt Trip test panels in cabinets 1 and 2 were not labeled to indicate whether they were for Train A or Train B; (2) the cabinets at 1RD05E were not labeled to indicate which one was Cabinet 1 or 2; (3) the temporary change to 1BOS 3.1.1-11 did not explicitly specify the correct cabinet location for functionally identical equipment in the Reactor Protection System where the selection of the wrong cabinet would cause a reactor trip; and (4) different locks were not installed on the doors to Cabinets 1 and 2 of 1RD05E, even though there was a capability to do this.

This is a Severity Level IV violation (Supplement I). (454/86005-01(DRP))

2. ANSI N18.7-1976/ANS-3.2, "Quality Assurance for the Operational Phase of Nuclear Power Plants" is endorsed by Regulatory Guide 1.33, Revision 2. Regulatory Guide 1.33, Revision 2 is committed to in Appendix A of the Byron FSAR. Section 5.2.10 of ANSI N18.7-1976/ANS-3.2, requires that housekeeping practices shall be utilized recognizing requirements for the control of work activities, conditions, and environments that can affect the quality of important parts of the nuclear plant. Housekeeping practices shall assure that only proper processes and procedures are utilized and that the quality of items is not degraded as a result of housekeeping practices or techniques. Particular attention should be given to housekeeping in work areas where important items are handled or stored to prevent damage.

Contrary to the above, on February 6, 1986, the 4.16 KV, Class 1-E circuit breaker for Component Cooling Pump 1CC01PA was observed to be removed from its associated safety related switchgear (Bus 141, Cubicle 12) and was being stored next to the switchgear without any protective covering over the circuit breaker. The failure to install a protective covering over the circuit breaker created the potential to degrade its quality by permitting the entry of foreign material into the internal mechanism of the circuit breaker.

This is a Severity Level V violation (Supplement I). (454/86005-02(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.

MAR 21 1986

Dated

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