

NOTICE OF VIOLATION

Commonwealth Edison Company
Byron, Units 1 and 2

Docket Nos. 50-454; 50-455
Licenses No. NPF-37; NPF-66

As a result of the inspection conducted on February 27 through March 16, 1989, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1988), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion III states, in part, that measures shall be established to assure that applicable regulatory requirements and the design basis for safety-related components and systems are correctly translated into specification drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled. Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design and be approved by the organization that performed the original design.

Contrary to the above, design control measures did not ensure that the design basis for systems and components were correctly translated into specifications, drawings, procedures, and instructions nor did they ensure that deviations from such standards were controlled. Specifically:

- a. Design calculation, CQD 220559, was incomplete in that it failed to seismically qualify sixteen valves installed in the safety-related nitrogen charging pressure/testing manifold per modification M6-1/2-84-118.
- b. The installing organization declared modification M6-2-88-004 as non-safety-related and deleted engineering requirements that specified the installation to be performed as safety-related without prior engineering approval.
- c. All design requirements for modification M6-2-87-166 were not implemented in that the requirement for periodic cleaning of relay contacts was not specified to plant personnel and thus, not incorporated into the preventive maintenance program.

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

2. 10 CFR 50.59(b) (1) states, in part, that the licensee shall maintain records of changes in the facility . . . and that these records must include a safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

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Contrary to the above, safety evaluations did not provide the bases for the determination that the change did not involve an unreviewed safety question. Specifically:

- a. The Safety Evaluation for Modification M6-288-004 did not provide the bases for the determination that the change did not involve an unreviewed safety question in that it dismissed the questions by claiming that the modification was non-safety-related.
- b. Additional examples of the use of "non-safety-related" as a justification as to why a change did not constitute an unreviewed safety question were found in Temporary Alterations 88-1-008, 88-0-009, 88-0-019 and 88-0-35. Temporary alteration 88-1-51 answered the questions by reference to a letter by the architect-engineer. However, the letter did not address the concerns of 10 CFR 50.59 in any manner.

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

3. 10 CFR Part 50, Appendix B, Criterion XI states, in part, that a test program shall be established to assure that structures, systems, and components will perform satisfactorily in service . . . which incorporate the acceptance limits contained in applicable design documents.

Contrary to the above, the post-modification test performed for modification M6-2-87-132 did not confirm that the acceptance criteria had been met in that the low pump suction pressure signal was not inserted after the pump had been running for the specified period of time.

This is a Severity level IV violation (Supplement I).

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) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will 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.

4-13-89
Dated

W. Shafer for
Hubert J. Miller, Director
Division of Reactor Safety