

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-456

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As a result of the inspection conducted from March 19 through April 29, 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 50.59 requires that a safety evaluation shall be performed when a proposed change or test is deemed to involve an unreviewed safety question (i) if the probability of an occurrence, the consequence of an accident, or malfunction of equipment important to safety as previously evaluated in the FSAR may be increased; or (ii) if a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created; or (iii) if the margin of safety as defined in the basis for any Technical Specification is reduced.

Section 7.6.10 of the Final Safety Analysis Report (FSAR) takes credit for the boron dilution prevention system (BDPS). Source range instrumentation provides the actuating signal for BDPS operation in the event of a flux doubling.

Technical Specification 3.3.1 requires that the source range nuclear instrumentation be operable in Mode 5 unless special conditions exist.

Contrary to the above, the 10 CFR 50.59 modification review conducted on February 27, 1989, for an auxiliary feedwater system temporary alteration was deficient in that it failed to recognize that implementation of the alteration would render the boron dilution prevention system (BDPS) inoperable and incapable of performing its intended function for approximately thirteen days (between February 28 and March 13, 1989). During that time, the reactor was in Mode 5 (cold shutdown).

This is a Severity Level IV violation (Supplement I).
(50-457/89009-01(DRP))

2. 10 CFR 50 Appendix B, Criterion V states, activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions or procedures.

Procedure BwAP 300-1, Revision 3, "Conduct of Operations," states:
"All operating personnel must be alert and remain within their immediate areas of responsibility until properly relieved and be responsible for monitoring the instrumentation and controls located in their areas. They are responsible for taking timely and proper action to ensure safe operation of the facility."

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Contrary to the above, on April 16, 1989, operations personnel failed to adequately monitor instrumentation and controls and take timely and proper actions to prevent an inadvertent safety injection (SI). This event occurred at 4:40 p.m. during a normal plant heat-up and pressurization. The event was caused by actions initiated by the previous shift personnel and by failure of the on-shift operations personnel to adequately monitor and control the system pressure increase. The SI automatically initiated when reactor coolant system (RCS) pressure was allowed to exceed 1930 psig prior to the heat-up reaching a secondary steam system pressure of greater than 640 psig. This resulted in about 5000 gallons of cold water from the reactor water storage tank being injected into the RCS, which was at about 500°F.

This is a Severity Level IV violation (Supplement I).
(50-456/89009-01(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) 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.

MAY 10 1989

Dated _____

Eileen M McKenna
Eileen M. McKenna, Acting Chief
Reactor Projects Branch 1