

Appendix

NOTICE OF NONCOMPLIANCE

Commonwealth Edison Company

Docket No. 50-374

As a result of the inspection conducted during April 23-25, 1985, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

1. Technical Specification 6.2.A requires; in part, that detailed procedures shall be written and adhered to covering safety-related activities such as recommended in Appendix A of Regulatory Guide (R.G.) 1.33 Appendix A.3.0, Revision 2, dated February 1978, including Auxiliary or Reactor Building HVAC systems.

Contrary to the above, on April 24 and 25, 1985, the inspector identified seven safety-related Temperature Indicating Controllers (TIC) relating to Diesel Generator rooms HVAC systems, and RHR Service Water pumps temperature control system, set at set points either above or below points specified by engineering data sheet and test calibration sheets. Also, operators did not identify this condition during their daily rounds, nor were there written procedures available to address this activity.

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

2. 10 CFR, Appendix B, Criterion V as implemented by Commonwealth Edison Company Corporate Quality Assurance Manual, Nuclear Generating Stations, Section 5, requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

Contrary to the above, the following examples of inadequate implementation of procedures were identified:

- a. CECO Procedure, LAP-240-6, Revision 6, requires that when a temporary system change such as a lifted lead is no longer required, the initiator will restore the system to normal; Obtain independent verification of restoration; Document the system restoration and verification (Attachment B, Part 5); Notify the Shift Engineer when completed.

On April 24, 1985, the inspector noted lifted lead No. LL130 associated with RHR Service Water Pump Room Dampers, (Work Request WRL46560) which lifted a black lead in HVAC panel 2PL74J. A review of Temporary System Change Log, Attachment A (LAP-240-6 Revision 6) indicated by the shift engineer's entry that it was restored on April 4, 1985, even though the lead was observed to be lifted and tagged inside panel 2PL74J.

- b. CECo Procedure, LAP-810-5, Revision 13, Item 7 requires that drawings which are not to be used for maintenance, operation, design, etc. are to be stamped "CAUTION This drawing/document is for administrative reference only....". Furthermore, the licensee has committed to stamp logic block diagrams at LaSalle 1 and 2 as follows: "For Information Only Not To Be Used For Construction and/or Operation."

A review of five Logic Block Diagrams by the inspector indicated that drawing M-5444 sh. 2 of 2, dated June 15, 1977, did not contain the latter stamp required as stated above.

This is a Severity Level V violation (Supplement 1).

3. 10 CFR 50, Appendix B, Criterion 17, as implemented by CECo Quality Assurance Manual, Section 17.1 requires that records be retained and maintained in accordance with a quality procedure to furnish evidence of activities affecting quality.

Contrary to the above, the NRC inspector observed that there were no records to indicate that relay No. 1427-AP040X1 was replaced which was observed to have a cracked coil during the implementation of traveller No. A-LS-1, Revision 1, dated October 14, 1981. This relay is utilized as an undervoltage relay for detecting undervoltage conditions and is utilized in load shedding of Safety Systems' ESS 4160V switchgear.

This is a Severity Level IV violation (Supplement 1).

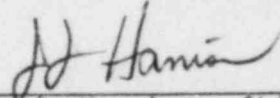
4. 10 CFR 50, Appendix B, Criterion 10, as implemented by CECo Quality Assurance Manual, Section 10.1 requires that individuals performing inspections shall have necessary qualifications and shall be independent of the individual directly responsible for performing the specific activity.

Contrary to the above, the NRC inspector observed during a review of traveller No. A-LS-1, Revision 1, dated October 14, 1981, that the individual who performed the replacement of safety-related HFA relay coils also performed the required QC inspection.

This is a Severity Level IV violation (Supplement 1).

MAY 23 1985

Dated _____



J. J. Harrison, Chief
Engineering Branch