

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-373

Docket No. 50-374

As a result of the inspection conducted on August 12-14, 26-28 and September 3, 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 3.7.7 (Area Temperature Monitoring) states that "The temperature of each area of Unit 1 and Unit 2 shown in Table 3.7.7-1 shall be maintained within the limits indicated in Table 3.7.7-1". TS Action item for 3.7.7.a requires that with one or more areas exceeding the temperature limit(s) shown in Table 3.7.7-1 for more than 8 hours, the licensee shall prepare and submit a Special Report to the Commission within the next 30 days and including an analysis to demonstrate the continued operability of the affected equipment.

Contrary to the above, the temperature limits of Table 3.7.7-1 were exceeded in the Unit 1 drywell during numerous and extended periods during 1984 and 1985 and a Special Report for these events were not submitted in a timely manner to the Commission to demonstrate the continued operability of the affected equipment.

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

2. 10 CFR 50, Appendix B, Criterion XIV, as implemented by Commonwealth Edison Company Quality Assurance Manual, Nuclear Generating Stations, Section 14, requires that measures be established for indicating the operating status of structures, systems, and components, such as by tagging.

Contrary to the above, on August 12 and 28, 1985, operator yellow caution tags attached in September 1984 to the control room containment monitoring recorders 2TR-CM037 and 2TR-CM038 indicated that the recorder alarms were set at 150° F whereas calibration records indicated that these alarms had been set at 140° F and 141° F respectively since January 26, 1984.

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

3. 10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Company (CECo) Quality Assurance Manual, Nuclear Generating Station, 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 failure to follow procedures or lack of documented procedures were identified:

- a. CECo procedure LLP 84-21: (1) Did not contain a specific time table for monitoring drywell temperatures, (2) The "checking" and "reviewer" signatures were missing from the available drywell temperature monitoring data, (3) The drywell temperature monitoring data was submitted to S&L in a noncontrolled manner contrary to CECo Quality Procedure Q.P. No. 6-1 titled "Distribution of Design Documents," (4) Acceptance criteria for Equipment Qualification (EQ) threshold temperatures used to assure component qualified life was erroneous in that ambient rather than housing temperatures were used, and (5) Attachments A and D lacked documented evidence of site engineering review as required by the QA Program, Section 6.
- b. Documented procedures were not available to address corrective actions to be taken by power plant operational personnel when temperatures exceed the TS 3.7.7 limits.
- c. A documented surveillance procedure requiring inspections and surveillance of piping or equipment insulation and other potential sources of increased sensible heat load, prior to closure of the drywell and return to power was not available.

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

4. 10 CFR 50, Appendix B, Criterion XVI, as implemented by Commonwealth Edison Company Quality Assurance Manual, Nuclear Generating Stations, Section 16, requires that measures be established to assure that conditions adverse to quality such as deviations, nonconformances . . . are promptly identified and corrected.

Contrary to the above, the licensee's Station Nuclear Engineering Department (SNED) failed to respond in a prompt and responsible manner regarding their evaluation and recommendations for containment monitoring (temperature) alarm set points as recalculated and supplied by S&L. S&L submitted this data through the LaSalle plant management for SNED review and evaluation in December 1984 for Unit 1 and January 1985 for Unit 2. Requested response dates were designated as January and February 1985; however, as of August 14, 1985, no effective action had been taken by SNED engineers to disposition this issue.

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

Pursuant of 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 violation and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

12/6/85

C. J. Paperiello
C. J. Paperiello, Director
Division of Reactor Safety