

## NOTICE OF VIOLATION

Commonwealth Edison Company  
Byron, Unit 1

Docket No. 50-454  
License No. NPF-37

During an NRC inspection completed on February 26, 1998, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violation is listed below:

1. 10 CFR 50 Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Bechtel Engineering, nondestructive examination procedure PT(SR)-ASME III/XI, Liquid Penetrant Examination, section 8, describes the required technique for performing the liquid penetrant examination. This technique complies with Section V, Article 6 of the ASME Boiler and Pressure Vessel Code, paragraph T-620 which specifies the procedure requirements for liquid penetrant examination.

Contrary to the above, on January 6, 1998, a licensee contracted Level II liquid penetrant examination (LPT) examiner incorrectly performed a liquid penetrant examination of the steam generator "A" field weld #1 hot leg, outside diameter(OD). Specifically the examiner violated an essential portion of the examination by removing the developer, recleaning, and reapplying developer without repeating the examination in full. This departure from procedure requirements could result in not identifying a weld defect in excess of Code allowable.

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

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

9803310066 980326  
PDR ADJCK 05000454  
G PDR

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois,  
this 26 day of March 1998