

Appendix

NOTICE OF VIOLATION

Iowa Electric Light and Power Company

Docket No. 50-331

As a result of the inspection conducted on December 1, 1981 through January 31, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. Technical Specification 6.8.1 states in part, "Detailed written procedures involving nuclear safety...shall be prepared... All procedures shall be adhered to." Administrative Control Procedure 1404.6, Section 6 states in part, "The person verifying installation of a jumper or lifted lead shall sign in the Installation verification space... When the clearance is to be removed the Shift Supervisor shall fill in the date, time, and authorization... The qualified personnel verifying the removal shall sign the Removal Verification Space."

Contrary to the above, the following jumpers and lifted leads did not comply with ACP 1404.6:

81-300 and 81-446 had no installation verification;

81-462 had no removal authorization or verification; and

81-483, 486, 490, 492, 493 had no removal authorization.

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

2. 10 CFR 50, Appendix B, Criterion XIII, states in part, "Measures shall be established to control the handling, storage,...and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration." The licensee is also committed to WASH-1284 which contains Regulatory Guide 1.38 that references ANSI N45.2.2-1972. This standard, Section 1.2, states in part, "The requirements are intended to assure that the quality of items is not degraded as a result of packaging, shipping, receiving, storage, and handling practices and techniques." Also, Section 3.2.4(2) states: "All openings into items shall be capped, plugged, and sealed. Weld end preparations shall be protected from corrosion and physical damage."

Contrary to the above, safety related stainless steel pipe fittings and flanges were stored in the warehouse with openings not capped, plugged or sealed. In addition, weld end preparations were not protected from corrosion and physical damage.

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

3. Technical Specification 6.8.3 states in part, "Temporary changes to procedures...shall be documented and promptly reviewed by the Operations Committee and by the Chief Engineer." Administrative Control Procedure 1402.2, Section 6.3.4, states in part, "Temporary revisions shall be submitted to the Operations Committee and Chief Engineer within 30 days for review.

Contrary to the above, Document Change Forms 3197, 3246, 3253 and 3320 were not reviewed within 30 days.

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

4. Technical Specification 6.2.1 states, "The plant staff organization shall conform to that shown in Figure 6.2.1."

Contrary to the above, the plant staff organization includes a third Assistant Chief Engineer, a Training Coordinator, and Assistant Supervisors in both Operations and Maintenance and these organizational changes are not reflected in Technical Specifications Figure 6.2.1.

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

With respect to Items 1, 2, and 4, the inspection showed that action had been taken to correct the identified items of noncompliance and to prevent recurrence. Consequently, no reply to these items of noncompliance is required and we have no further questions regarding this matter. With respect to Item 3, 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 item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

MAR 15 1982

Dated

R. L. Spessard, Director  
Division of Project and  
Resident Programs