

APPENDIX A

NOTICE OF VIOLATION

Pacific Gas and Electric Company
77 Beale Street, Room 1451
San Francisco, California 94106

Docket Nos. 50-275, 50-323
License No. DPR-80, DPR-82

As a result of the inspection conducted during the period of February 24 through March 7, 1986, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), the following violations were identified:

- A. Facility Technical Specification 6.8.1.a requires that written procedures be established, implemented and maintained as recommended by Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of this revision of Regulatory Guide 1.33 recommends written procedures for maintenance that can affect the performance of safety-related equipment.

Facility procedure C-750, Rev. 4, "Preventive Maintenance Program", sets forth procedures for conducting preventive maintenance. Paragraph 2.g.(2) of this procedure states, "A deletion or change to a Priority 5 or 6 PM task shall be explained in the Comments section of the PM Worksheet. The change will be evaluated by the appropriate Engineer, Planner or Foreman upon completion of the Worksheet. Should the change be unacceptable, it shall be noted on the Worksheet and reissued for work. If acceptable, the appropriate authorizing signature shall be affixed to the Worksheet."

Contrary to the above, Action Request No. A4687, dated August 16, 1985, requested Priority 5 preventive maintenance on the Unit 1 Component Cooling Water Pump No. 1-1 and Motor. The individual performing this maintenance on or about October 18, 1985, made approximately eight changes to the PM Task Description Supplement - including a change in the type of lubricant to be used (the change was to the correct type). No explanation of these changes was provided in the Comments section of the PM Worksheet and there was no evidence the changes had been noted or evaluated by the assigned reviewers. In addition, the "Approved for Change" entry on the PM Task Description Supplement was not signed.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 1.

- B. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings" states 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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

1. Valve drawing DC-663219-292-2 requires a gasket of approximately 11 inches inner diameter by 12 inches outer diameter by 1/8 inch thick be used for the body-to-bonnet seal.

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PDR ADDCK 05000275
Q PDR



Contrary to the above, maintenance Shop Work Follower SWF MM-1-82-021, completed March 3, 1982, for Unit 1 valve RHR 8726A records the use of a gasket with dimensions 10-5/16 inch inner diameter by 12 inches outer diameter by 1/4 inch.

This is a Severity Level IV Violation (Supplement 1) applicable to Unit 1.

2. Electrical maintenance procedure E 53.4 Rev. 6, "Maintenance of Rotork Motor Operated Valves" requires setting of limit and torque switches in accordance with vendor instruction manual DC-663314-332. DC-663314-332 states in part "in the absence of specific valve manufacturer instructions", butterfly type valves should be set to torque close. No specific valve manufacturer instructions existed and, therefore, the valve is required, by this procedure, to be set to torque close.

Contrary to the above, at the time of the inspection, mechanical maintenance procedure M 51.9 Rev. 1 "Rotork Valve Operator Maintenance" stated torque and limit switches shall be set such that "in the closed position the mechanical stop has not been reached." This acceptance criteria can only be met if a valve is set to limit close since the mechanical stop must be reached for the valve to torque close.

Provision of mutually exclusive acceptance criteria in E 53.4 and M 51.9 is considered a failure to include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

This is a Severity Level IV Violation (Supplement I) applicable to Units 1 and 2.

3. Velan Engineering Company Drawings 663219-106-6 and 663219-376-2 for valves RHR-2-641 A and B and RHR-2-8703, respectively, show the installation of mechanical position indicators.

Contrary to the above, at the time of inspection, the position indicators had not been installed on the valves.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 2.

- 4.a. Diagram of Connections, Dwg. No. 502650 Rev. 5 shows for valve RHR-2-8700B a jumper wire connecting stem position switch, XPOS648, point B2 to rotor limit switch assembly, XPOS647, point 14B.

Contrary to the above, at the time of inspection, the jumper wire was installed in valve RHR-2-8700B connecting stem position switch, XPOS648, point B2 to rotor limit switch assembly, XPOS647, point 14A. This installation was accepted by quality control personnel on March 14, 1979.



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- 4.b. Diagram of Connections, Dwg. No. 441685 Rev. 3 shows for valve CCW-2-FCV-431, a jumper wire installed connecting point 25 to 26.

Contrary to the above, at the time of inspection, no jumper wire was connecting point 25 to 26, however, a jumper wire connected point 8 to 26 which was not shown on the Diagram of Connections. This installation was accepted by quality control personnel on May 19, 1976.

- 4.c. "Interconnection Diagram for Bus G" Dwg. No. 441659 Rev. 1 shows wire G11SB6 landed on TB-X, 10 within 4160 V switchgear cubicle, HG12.

Contrary to the above, at the time of inspection, G11SB6 was lifted from the designated termination point. No record of this wire having been lifted was available.

Collectively the three wiring errors described above are a Severity Level IV Violation (Supplement I) applicable to Unit 2.

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement of explanation in reply including: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

APR 28 1986

Dated

Talbert Young Jr.
T. Young, Chief
Engineering Section

