

Appendix A

NOTICE OF VIOLATION

American Electric Power Service
Corporation

Docket No. 50-315

As a result of the inspection conducted on June 15-19 and 22-23, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion II requires in part, that activities affecting quality be accomplished under suitably controlled conditions, such as adequate cleanliness and the need for special controls.

The American Electric Power Company Quality Assurance Program for the Donald C. Cook Nuclear Plant, Appendix A, contains a commitment to the regulatory positions of Regulatory Guide 1.39(10/76) and to the requirements of ANSI N45.2.3-1973. ANSI N45.2.3-1973 requires in part that the control of all tools, equipment, materials, and supplies be maintained to prevent the inadvertent inclusion of deleterious materials or objects in critical systems. ANSI N45.2.3-1973 also requires that garbage, trash, scrap, litter, and other excess materials be collected, removed from the job site, or disposed of in accordance with specified requirements or planned practices. Such excess material shall not be allowed to accumulate and create conditions that will adversely affect quality.

Refueling Procedure FP-AEP-R5 Unit 1 Cycle V-VI Section 6.0E contains the following precautions:

- 1.b Lanyards are to be attached to all tools and the lanyard tied to the person using the tool or to a permanent fixture.
- 1.c Pens and marking materials which will not float are banned from the upper volume.
- 1.f Eyeglasses are to be securely attached to the wearer.
- 1.g Dosimetry equipment must be securely taped to your anti-contamination clothing.

Plant Manager's Special Instruction No. PMSI.069, Unit 1, Refueling Outage-1981 contains the same precautions as FP-AEP-R5 and in addition in Section 8.1.2.e states all loose materials, tools, and equipment that are not being used are to either be removed from the containment or be placed in a location outside the safety cables around the cavity in order that they might not become accidentally dislodged and fall into the reactor cavity.

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Contrary to the above, the licensee does not have a program to adequately enforce procedures and maintain suitable controlled conditions as evidenced by the following items noted during plant tours on June 17 and 22, 1981, and occurring during refueling operations on June 21 and 22, 1981.

- a. On two occasions, hand-held tools were observed being carried across the manipulator crane bridge or around the open refueling cavity without the use of lanyards.
- b. Poly bottles were noted left within the safety cable area without being tied down.
- c. Pens and felt-tip markers were observed in use in the upper volume.
- d. Radiation protection clothing articles were left loose within the safety cable area. Poly bags for radiation protection trash were taped to the safety cables in such a manner as to allow their contents to be easily dislodged and fall into to the cavity.
- e. Scrap and excess material had accumulated in an uncontrolled pile in a corner of the upper volume in relative proximity to refueling operations.
- f. An individual dropped his eyeglasses into the refueling pool.
- g. An individual's headset was pulled into the refueling pool.
- h. On two occasions, at least five individuals were observed without dosimetry securely taped to their anti-contamination clothing.

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

2. D. C. Cook Unit 1 Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972. Appendix "A" of Regulatory Guide 1.33 recommends written procedures covering in part, Equipment Control and Procedure Adherence.

D. C. Cook Procedure No. PMP2110.CPS.001, Clearance Permit System, Revision 0, item 6.0 requires that when an Emergency Diesel Generator is to be removed from service the other Emergency Diesel Generator for that Unit is to be proven operable and will then be left running until the diesel engine being removed from service has been isolated, the Clearance Permit tags placed as required, and the Clearance Permit has been accepted by the individual who will be performing the designated work.

Contrary to the above, the CD diesel generator for Unit 1 was removed from service on June 16, 1981 without running and proving operable the AB diesel generator.

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

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.

Dated Jul. 15 1981

C. E. Norelius

C. E. Norelius, Acting Director
Division of Engineering and
Technical Inspection