

Appendix

NOTICE OF VIOLATION

American Electric Power Service
Corporation
Indiana and Michigan Electric Company

Docket No. 50-315
Docket No. 50-316

As a result of the inspection conducted on April 22, May 15-17, May 23-24, and June 19, 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. 10 CFR 50.54(h) states that the licensee shall be subject to the provisions of the rules, regulations, and orders of the Commission. On March 14, 1983, the Commission issued an Order confirming the licensee's commitments on Post-TMI related issues. The Order states, in part, that the licensee shall implement and maintain the specific items described as complete in the attachments to the Order. Attachment 1 to the Order lists the licensee's completion schedule date for NUREG-0737 Item II.F.1, Attachment 1, "Noble Gas Effluent Monitors," as May 31, 1983.

On December 16, 1983, the Commission issued a modification to the March 14, 1983 Order which established, in part, a new completion date for NUREG-0737 Item II.F.1, Attachment 1. This item was to be fully implemented and the equipment maintained by the end of the 1983 Unit 1 refueling outage.

Contrary to the above, as of March 17, 1985, the licensee had failed to maintain the noble gas effluent monitoring system for the main steam safety valves/power operated relief valve pathway operational in that two of the four loop monitors on each unit had been out of service since at least September 1984.

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

2. Technical Specification 6.12.1.a requires that a high radiation area greater than 100 mrems/hr but less than 1000 mrems/hr be barricaded and conspicuously posted as a high radiation area.

Contrary to the above, on May 23, 1985, an accessible high radiation area in Room 334, measuring about 170 mrems/hr, was not posted or barricaded.

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

3. 10 CFR 20.201(b) states that each licensee shall make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations of this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

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As used in the regulations in this part, "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and measurements of levels of radiation or concentrations of radioactive material present.

The following examples of failure to perform evaluations of radiation hazards were identified:


- a. Contrary to the above, on May 15, 1985, adequate surveys of the radioactive waste dumpster on the 650-foot elevation and the radioactive material storage area under the Unit 1 exhaust and supply ventilation unit had not been conducted which resulted in improperly posted radiation areas.
- b. Contrary to the above, on April 29, 1985, an adequate release survey of three Teletectors was not conducted before shipment to a vendor for repair and calibration. The Teletectors contained a maximum of about 450,000 dpm per 100 square centimeters fixed and 700 dpm per 100 square centimeters removable contamination.
- c. Contrary to the above, on April 20, 1985, the licensee failed to evaluate the consequences of isolating the containment purge system while venting the steam generators to the purge system through portable ventilation systems that contained no charcoal filters. This resulted in a release of radioactive iodine into the containment to a concentration of about 10 times MPC and the intake of small quantities of the iodine by several workers.

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

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. Consideration may be given to extending your response time for good cause shown.

Dated

7/9/85


C. J. Paperiello, Chief
Emergency Preparedness and
Radiological Protection Branch