

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 December 2, 1985, through February 14, 1986, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the following violation was identified:

Units 1 and 2 Technical Specification 6.8.1.c requires that written procedures be established, implemented and maintained covering surveillance and test activities of safety-related equipment.

Contrary to the above, the following examples of failure to properly implement or maintain surveillance procedures for safety-related equipment were identified:

- a. (1) Procedure 12-THP 6030.IMP.062, Revision 0, "Protection System Bistable Adjustment/Replacement Procedure," which implements Technical Specification 6.8.1, requires the performance of an evaluation to assess the need to perform a partial or complete instrument calibration when a protective system bistable is found out of tolerance during a surveillance test. This evaluation is required to be documented using a "signoff sheet." This procedure also requires that bistable performance be tracked with a "bistable requiring adjustment" data sheet.

Contrary to the above, the licensee failed to implement the "Protection System Bistable Adjustment/Replacement Procedure" in that neither the "signoff sheets" nor the "bistable requiring adjustment" data sheets had been completed for six Unit 2 bistables adjusted during July 1985 and one Unit 2 bistable adjusted during October 1985.

- (2) Procedure 12-THP 6030.IMP.062 requires that bistables that fail twice be replaced. Contrary to this, one of two Unit 2 bistables, which had failed twice (2LB-549A) during the period from September to December 1985, had not been replaced.
- (3) Procedure 12-THP 6030.IMP.062 requires that the surveillance test frequency of failed bistables be increased to a 14 day test cycle. Contrary to this; the test frequency was not increased for two Unit 2 bistables (2PB-514D and 2LB-549A) that had failed one or more times during the period from September to December 1985.

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- b. (1) Procedure 1-THP 6030.IMP.130, Revision 2, "Intermediate Range Nuclear Instrumentation Calibration (N-35, N-36)," requires that certain information be recorded on the data record sheets in order to properly perform and document the performance of the calibration. Contrary to this, numerous required calibration data entries had not been made during the Unit 1 intermediate range nuclear instrumentation (IRNI) calibration, conducted on May 31, 1985.
- (2) The IRNI channel functional tests contained in Procedures 1-THP 4030.STP.080, "SU(1) Instrument Checks Prior to Start-Up," and 1-THP 4030.STP.025 (and .026), "Intermediate Range Nuclear Instrumentation Protection Set I (N-35) (and Set II (N-36)) Surveillance Test," require the use of trip setpoints obtained from the latest IRNI calibration data for both the "High Level Rod Stop" and "High Level Trip" bistables. Contrary to this, in numerous instances between October 7, and November 18, 1985, the value for the "High Level Rod Stop" bistable trip and the "High Level Trip" bistable trip used in the channel functional tests were different from the values provided in the latest IRNI calibration (1-THP 6030.IMP.130, performed May 31, 1985).

This is a Severity Level IV violation (Supplement 1).

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 violation: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

3/12/86



Carl J. Paperyello, Director
Division of Reactor Safety

