

Notice Of Violation

Indiana Michigan Power Company

Docket No. 50-315; 50-316
Licenses No. DPR-58; DPR-74

As a result of the inspection conducted on June 11 through July 13, 1990, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1990), the following violations were identified:

1. 10 CFR Part 50, Appendix B, Criterion III, states, in part, that design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design.

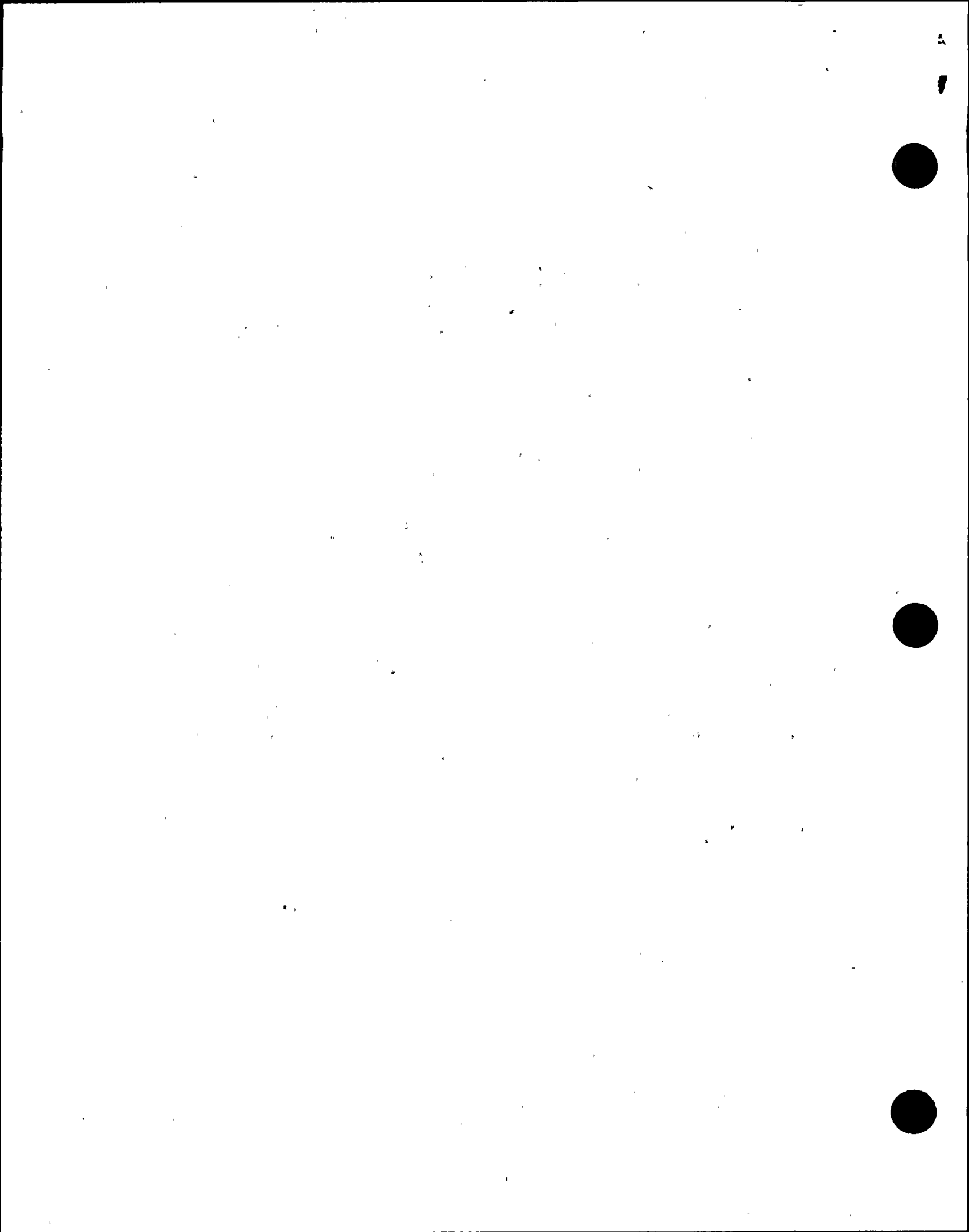
Contrary to the above, in June 1989, the licensee replaced a valve in the component cooling water heat exchanger inlet line manufactured by Centerline Company with a valve manufactured by the Henry Pratt Company under maintenance job order 728163 without engineering review or evaluation. Further, at least one of the pipe flange bolt holes was enlarged to achieve alignment with the new valve without engineering evaluation.

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

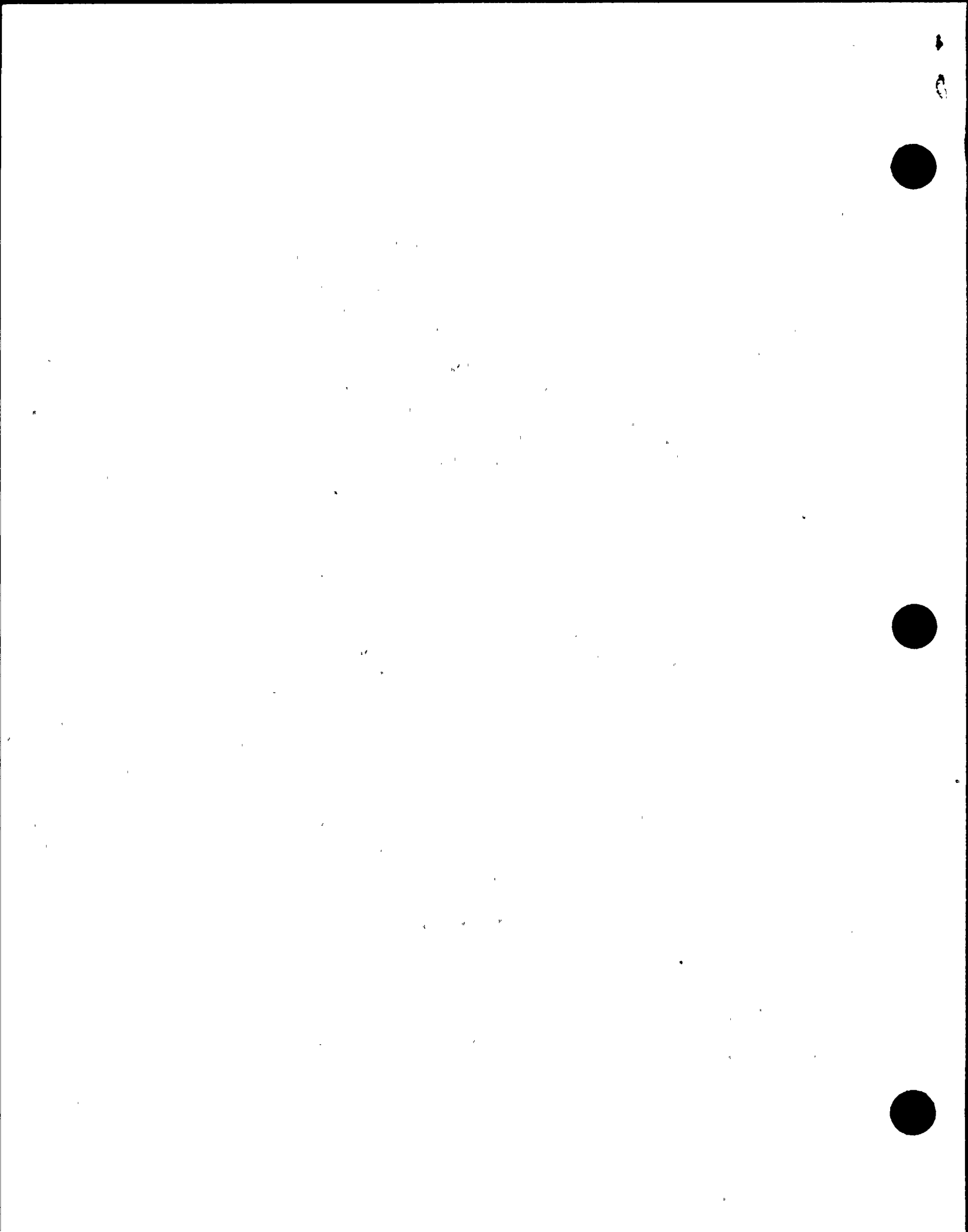
2. 10 CFR Part 50, Appendix B, Criterion V, states, in part, that activities affecting quality shall be prescribed and accomplished by documented instructions, procedures, or drawings, and that the instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria. Further, D.C. Cook Technical Specifications Section 6.8 requires that written procedures be established, implemented, and maintained, for activities such as those listed in Appendix A of Regulatory Guide 1.33, involving procedure adherence, temporary change method, procedure review and approval, and review procedures.

Contrary to the above, the following violations of this requirement were identified:

- a. Licensee procedure PMI.2010, "Plant Manager and Department Head Instructions, Procedures, and Associated Indexes", required that a procedure that had not been reviewed by its biennial review date should be so annotated and not be used prior to this review. Procedure 1THP6030.STP.068, "Essential Service Water Liquid Process Monitor (R-20) Surveillance Test", was performed on June 21, 1990, with its biennial review overdue by more than five months (last reviewed in January 1988). The procedure was not annotated to indicate the overdue status.



- b. Licensee procedure PIII.2010 required that any procedure designated with a double asterisk be present and used at the job site. On June 13, 1990, procedure 12MHP5021.032.025, "Emergency Diesel Engine Timing and Balancing," which was designated with a double asterisk and provided instructions for adjusting exhaust temperatures and for obtaining measurements and adjustments in combustion and compression pressures, was not available at the job site nor used when taking cylinder pressure measurements on the 1AB Emergency Diesel Generator.
- c. Section 5.0 of licensee procedure 12PMP2030.VICS.001, "Control of Vendor Documents," required that all vendor information, including bulletins, letters, and vendor manuals or revisions, be processed and controlled to ensure their proper availability and use under the licensee's document control system. Procedure 12MHP50211.032.026, "Emergency Diesel Engine Inlet and Exhaust Hydraulic Valve Lifters Inspection and Testing," provided an acceptance criteria that was contrary to the vendor's instruction manual. The licensee produced a copy of a vendor letter dated March 19, 1984, which authorized the criteria the licensee was using. However, this letter was not included in the controlled vendor information/manual file.
- d. Licensee procedure PHI.7030, "Condition Reports and Plant Reporting", required that a condition report be issued for nonconforming conditions. No condition report was issued for the following surveillance deficiencies, nor was any basis given for not issuing the report:
- o The specified counts per minute (CPM) range was exceeded for surveillances 1THP4030STP.068 (step 7.12.3.2) on October 10, 1989, July 25, 1989, and January 15, 1989; 1THP4030STP.075 (step 7.12.3.2) on May 8, 1989; and 2THP4030STP.175 (step 7.12.3.2) on July 7, 1989.
 - o The required CPM valves were not recorded for surveillances 1THP4030STP.068 (Steps 7.12.3.2 and 7.11) on February 27, 1989; 2THP4030STP.168 (step 7.12.2.2) on June 23, 1989; and 1THP4030STP.075 (step 7.1.2.3.2) on April 2, 1990.
 - o The low level alarm setpoint (step 7.10) for surveillance 1THP4030STP.068 was exceeded by a factor of ten on March 30, 1990.
 - o The flow through valve 1-ESW-113 during surveillance 10HP4030STP.022E (steps 8.9.2 and 8.9.3) did not exceed the required 610 gallons per minute.
 - o The required independent verification was not performed on June 21, 1990, for surveillance 1THP6030.IMP.012. Further, four change sheets were needed before the surveillance procedure could be accomplished.



- e. Licensee procedure NEP 6.4, "Calculations", required that an independent review of calculations be completed and documented on a verification checklist. It also required that the cognizant section manager approve the verification checklist.

Contrary to the above, the verification checklists for the following calculations were improperly completed in that relevant review items were noted as "not applicable" or were not addressed:

- HXP900628AF dated July 6, 1990
- HXP900627AF dated July 6, 1990
- HXP900629AF dated July 9, 1990

In addition, the verification checklist for calculation HXP900613.AF was not approved by the cognizant section manager.

The above examples constitute a Severity Level IV violation (Supplement I).

3. 10 CFR Part 50, Appendix B, Criterion VI states, in part, that measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe activities effecting quality. Further, licensee implementing procedure PMI.2030 states, in part, that controlled documents shall be filed in a timely manner Superseded documents are to be destroyed.

Contrary to the above, six controlled aperture cards in the maintenance library were not the latest revision (PS2-94208-4; PS2-94209-15; PSI-94208-14; PS2-94209-9; PSI-94209-9; and PS2-94206-4), and for 1094202-14-17 had both the current and outdated revisions in the file.

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

4. 10 CFR Part 50, Appendix B, Criterion XI states, in part, that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above, station batteries 2AB, 2CD, and 1AB emergency load discharge (service) tests were being performed to a load profile 35 to 65 percent below the actual load profile calculated by the engineering staff in 1984-85. As a result, these tests did not confirm that the batteries could perform their emergency function.

This is a Severity Level IV 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 violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will 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.

11/8/90
Dated

T. O. Martin
T. O. Martin, Acting Director
Division of Reactor Safety

