

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-255

As a result of the inspection conducted during the period December 24, 1985, through February 3, 1986, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion XVI, as implemented by Consumers Power Company (CPCo) "Quality Assurance Program for Operational Nuclear Power Plants" (CPC-2A), requires that measures shall be established to ensure that conditions adverse to quality are promptly identified and corrected. Further, CPC-2A, Section 16.2.2 requires that, for conditions noted adverse to quality, appropriate remedial action is taken and corrective action is implemented in a timely manner.

Contrary to the above:

Appropriate remedial action was not taken and corrective action not implemented in a timely manner for conditions noted adverse to quality. In Inspection Report No. 255/85003(DRP) a Notice of Violation was issued for thirteen Administrative Procedures being overdue for biennial review because, although QA surveillances had found overdue procedures, corrective action had not been effective. In response to this violation (255/85003-01(DRP)), the licensee committed to utilizing the Periodic Activity Control (PAC) system to provide early notification of impending biennial reviews with the capability for readily identifying overdue items. Full compliance was to have been complete by July 15, 1985. As of January 23, 1986, the EOPs and ONPs were not entered on the PAC system. On January 24, 1986, seven Emergency Operating Procedures (EOPs) and eleven Off Normal Procedures (ONPs) were noted as overdue for biennial review. For some procedures that were entered on the system, the dates given were meaningless as to when the biennial review was required.

This is a Severity Level IV violation (Supplement I) (255/85034-01(DRP))

2. Technical Specification 6.8.1.a requires that written procedures shall be established, implemented and maintained for applicable procedures in Appendix "A" of Regulatory Guide 1.33 as endorsed by CPC-2A which includes procedures for abnormal, offnormal and alarm conditions.

Alarm and Response Procedure 8 requires that an invalid Safety Injection Signal (SIS) be reset and that the actuated equipment be restored to normal.

Contrary to the above, while in cold shutdown on December 10, 1985, following a spurious SIS, the SIS was not reset properly until December 14, 1985.

This is a Severity Level IV violation (Supplement I)(255/85034-04(DRP))

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.

3-12-86
Date

N. J. Chrissotimos
N. J. Chrissotimos, Chief
Reactor Projects Branch 2