

Enclosure 1.

DESCRIPTION OF VIOLATIONS

Metropolitan Edison Company
Docket Nos. 50-289/320
License Nos. CPPR-40/66

Certain activities under your license appear to be in violation of Regulatory requirements as indicated below:

1. Part 50.55e, 10 CFR 50, states in part: ". . .the holder of the permit shall notify the Commission of each deficiency found in design and construction which, were it to have remained uncorrected, could have affected adversely the safety of operations of the nuclear power plant at any time throughout the expected lifetime of the plant. . .".

Contrary to this requirement, three engineered safeguards pump motors were found to have been water-damaged during the time of the flood which occurred on or about June 23, 1972 and were subsequently removed for repair. There was no equipment damage reported to Regulatory Operations in response to our letter of June 27, 1972 which addresses damage to equipment during the flood.

2. 10 CFR 50, Appendix B, Criterion V, states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria. . ." and Criterion XVI states in part: "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations and nonconformances are promptly identified and corrected . . .".

Contrary to the above:

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- a. Several instances were identified under the engineered safeguards consoles (CC and CR) where the physical separation of redundant channels was less than two inches which is less than the separation described in United Engineers and Constructors Procedure ECP-3, and the commitment documented in paragraph 8.2.2.12c of the FSAR. No deficiency reports had been prepared as required by United Engineers and Constructors Procedure QC-17.
- b. Procedures have been prepared for use in verification that instrumentation, sensors, and associated lines have been installed in accordance with engineering drawings. However, the procedures do not include quantitative or qualitative acceptance criteria for the physical separation of instruments, sensors and their associated lines for redundant channels, to preclude a single failure within the protection system, as described in paragraph 4.2 of IEEE 279, as required by paragraph 7.1.1 of the FSAR.
- c. The United Engineers and Constructors Procedure QC-13, which was revised on October 27, 1972, to reinstate the requirement for quarterly field audits of tools, gauges, and instruments, did not list the equipment subjected to the audit nor provide quantitative or qualitative acceptance criteria. Further, the procedure permitted the person conducting the audit the discretion of determining the applicability of the check list. As a consequence, the audit results did not supply adequate data to determine whether the intent of the procedure had been satisfactorily accomplished.
- d. United Engineers and Constructors Procedure ECP-10 requires that surveillance be performed on instrument panels, control boards, and related equipment to assure that controlled storage conditions are maintained. Metropolitan Edison further clarified the intent of this procedure in their letter of reply dated November 3, 1972, to the initial violation, by including installed, but not energized equipment under the surveillance requirements. Surveillance records address general cleanliness and temperature conditions of the electrical equipment storage area, but do not list the equipment subject to this surveillance, nor its location, precluding a determination that all such equipment is properly maintained. A list of the equipment requiring

surveillance, and the location of the equipment, was not available in the organization responsible for this function.

- e. United Engineers and Constructors Procedures ECP-6 and ECP-10 both require notification of the field supervisor, Quality Control, prior to the installation of engineered safeguards equipment. Four engineered safeguards motors were installed without the written notification described in Metropolitan Edison's reply dated November 3, 1973 to the initial violation.

- f. United Engineers and Constructors Procedure ECP-6 further requires that the engineered safeguards motor shafts be rotated monthly. Twelve engineered safeguards motors for Unit 1 were identified which did not have the motor shafts rotated within the specified frequency. Six of these 12 motors show no disposition regarding rotation since their receipt. Approximately 15 motors, 5 of which were subsequently identified as engineered safeguards motors for Unit 2, had been stored in a separate warehouse with no record of motor shaft rotation since their receipt. Corrective action had not been effected between October 6, 1972, when this deficiency was directed to your attention, and March 28, 1973.

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