

Appendix A

NOTICE OF VIOLATION

Wisconsin Electric Power Company

Docket No. 50-266

Docket No. 50-301

Based on the inspection conducted on August 1-31, 1980, it appears that certain of your activities were not conducted in full compliance with NRC regulations as indicated below. Items 1 and 2 are infractions. Item 1 is applicable to both units and item 2 is applicable to Unit 1.

1. 10 CFR 50.55a Section G(4) requires components which are classified as ASME Code Class 1, Class 2 and Class 3 to meet the inservice inspection requirements set forth in Section XI of editions of the ASME Boiler and Pressure Vessel Code and Addenda. The 1974 edition of Section XI, Subsection IWV, Article IWV-3000, Paragraph IWV-3410 c(3) requires in part that, "If an increase in stroke time of 25% or more from the previous test for valves with stroke times greater than 10 seconds or 50% or more for valves with stroke times less than or equal to ten seconds is observed, test frequency shall be increased to once each month until corrective action is taken..."

Contrary to the above, a partial review of data from IT-20, and IT-45 for the period 4-77 to present revealed that valves 539, 508, 850B, 538, and 897A showed increases in cycle times as listed below and were not subjected to shortened test intervals.

<u>Valve Number</u>	<u>Test Interval</u>	<u>Stroke Time Percentage Increase</u>	<u>Stroke Direction</u>
539	10/19/79-01/18/80	97	Open
508	07/21/79-10/19/79	94	Open
	10/19/79-01/18/80	151	Closed
	04/18/80-07/19/80	135	Open
538	04/77-01/23/78	53	Open
897A	01/05/80-04/07/80	67	Closed
850B	01/19/80-05/11/80	58	Open

2. Technical Specification 15.3.3.B.2.c requires for the containment spray system that, "Any valve required for the functioning of the system during accident conditions may be inoperable provided repairs are completed within 24 hours. Prior to initiating repairs, all valves in the system that provide the duplicate function shall be tested to demonstrate operability."

Contrary to the above, on August 27, 1980 after completing packing adjustment on the isolation valve from the RHR system to a Unit 1 containment spray pump (817A), but prior to performing post maintenance testing on the valve, packing adjustment was initiated on the duplicate valve (871B) to the other spray pump.

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