Appendix A

NOTICE OF VIOLATION

Toledo Edison Company Docket No. 50-346

This refers to the inspection conducted by representatives of the Region III (Chicago) office at the Davis-Besse Nuclear Power Station, Unit 1, Oak Harbor, Ohio, of activities authorized by NRC License No. NPF-3.

During this inspection conducted on June 6-8, 13-15, 20-23, and July 17-19, 1978, the following apparent items of noncompliance were identified. Item 1 is a violation. Items 2 and 3 are infractions.

1. Section 3.8.1.1.b of the Technical Specifications requires that two separate and independent AC diesel generators be operable when the reactor is in Modes 1, 2, 3, and 4. Section 4.8.1.1.2.c.3, which states the requirement for demonstrating operability, requires that the diesel generator start on a loss of offsite power in conjunction with a safety injection signal, de-energize and load shed the essential buses and energize the auto-connected essential loads through the load sequencer. Section 3.3.2.1, Table 3.3-3, item 4 of the Technical Specifications requires sequence logic channels of the SFAS to be operable when the reactor is in Modes 1, 2, 3 and 4.

   Contrary to the above, two separate and independent AC diesel generators were not operable when the reactor was operated in Modes 1, 2, 3, and 4 for startup testing purposes during the period August 12, 1977 through April 28, 1978. Because of inoperability of the sequence logic channels of the SFAS, the diesel generators were not capable of auto-connecting essential loads to essential buses C-1 and D-1 for all conditions of safety injection signals in conjunction with a loss of offsite power.

   This violation had the potential for contributing to an occurrence related to health and safety.

2. The requirements of 10 CFR Part 50, Appendix B, Criterion XI, and Section 17.2.11 of the FSAR as implemented by the Toledo Edison Quality Assurance Procedure No. 2110, "Test Control," state 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.

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Contrary to the above, a test program was not adequately established. Specifically,

a. The preoperational test TS 310.02, "Integrated SFAS Test," performed February 19-23, 1977 did not adequately test the feature of the SFAS designed to cope with a loss of offsite power followed by a safety injection (SFAS) signal.

b. The scheme check dated March 15, 1977, performed in conjunction with the design modifications to the Safety Features Actuation System completed under System Revision Notice 221E dated February 14, 1977 did not meet the requirements of the Calibration and Functional Testing Procedures 1-C, "Scheme Verification Procedure," Revision 1, steps 6.5 and 6.6 in that the scheme check did not identify the circuit abnormalities discovered in June 1978 nor insure proper control over modifications of the diesel generator circuitry.

3. Section 6.8.1 of the Technical Specifications requires that written procedures be established, implemented and maintained. Administrative Procedure 1823.00 "Jumper and Lift Wire Control Procedure," requires a monthly review by the Operations Engineer or his representative of the jumper and lifted wire log to prevent carrying entries for a long period.

Contrary to the above, monthly reviews of the jumper and lifted wire log were not adequate to prevent carrying entries for a long period in that during June 1978, lifted wire tags which had been installed in March 1977 for testing purposes were found in cabinets CDF 11A-2 and CDE 11C on open slide links. The quality of the monthly reviews was not adequate in that these open slide links would have prevented valves MS 106 and MS 106A from closing in the event that the steam supply lines to the auxiliary feedwater pumps ruptured.

As you are aware from the "Criteria for Determining Enforcement Action," which was provided to the NRC licensees by letter dated December 31, 1974, the enforcement actions available to the NRC include administrative actions in the form of written notices of violation, civil monetary penalties, and orders pertaining to the modification, suspension or revocation of the license. After careful evaluation of the items of noncompliance set forth above and the enforcement history at the Davis-Besse facility, we conclude that this Notice of Violation is the appropriate action at this time.

This notice is sent to you pursuant to the provision of Section 2.201 of the NRC's Rules of Practice, Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty (20) days of your receipt of this notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

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