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Toledo Edison Company  
ATTN: Mr. J. P. Williamson, President  
300 Madison Avenue  
Toledo, Ohio 43652

Docket No. 50-346  
License No. CPFR-80

NOTICE OF VIOLATION

Gentleman:

Based on the results of an NRC inspection, conducted on May 19-22, 1975, it appears that certain of your activities were not conducted in full compliance with NRC regulations as indicated below. These items are considered to be infractions.

1. 10 CFR Part 50, Appendix B, Criterion III, "Design Control", states, in part, that "Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in Section 50.2 and as specified in the license application . . . are correctly translated into specifications, drawings, procedures and instructions." Paragraph 8.1.5 of the FSAR sets forth the design basis for the electrical systems and references several design documents which are to be implemented. Section 8.3 of the FSAR describes the on-site power system which is designed to meet specified requirements.

Contrary to this requirement, the applicable requirements and the design bases relating to cable separation and seismic support of electrical conduit have not been translated into specifications, procedures or instructions.

2. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings", states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, . . . and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to this requirement, certain activities affecting quality relative to cable raceways have not been accomplished according to prescribed procedures. Examples include the following:

- A. Cable trays contained debris, including rags, pieces of conduit and unistrut material contrary to the implementing procedure, Fischbach and Moore Procedure IIP-7749-E14-7c.001, paragraph 3.2(2), which requires inspection "to assure that specified raceway is clean without protrusions, abrasives, or sharp edges which could damage the cable."

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- B. Sharp edges were apparent at most wireway installations observed, and cables and conductors were noted to have insulation damage contrary to the implementing procedure, Fischbach and Moore Procedure IIP-7749-E14-7a.001, paragraph 3.2(7), which requires that "Sharp edges and burrs which could affect cabling being pulled into the raceways shall be removed."
3. 10 CFR Part 50, Appendix B, Criterion XIV, "Inspection, Test and Operating Status", states, in part, that "Measures shall be established to indicate by the use of markings such as stamps, tags, labels, routing cards or other suitable means, the status of inspections and tests performed upon individual items of the nuclear power plant . . . These measures shall provide for the identification of items which have satisfactorily passed required inspections and tests, . . ." The plan for implementing this criterion is set forth in Paragraph 17.1.2.14 of the FSAR.

Contrary to this requirement, routings for cables numbered 2CBF1180C, 2CVDN13AE, and 4CY406A which were marked as having been satisfactorily inspected were determined by our inspectors to be routed differently than indicated on the routing cards, and in one instance, different than the master circuit schedule for cables.

4. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action", states, in part, that "Measures shall be established to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly corrected." The plan for implementing this criterion is set forth in Paragraph 17.1.1.16 of the FSAR and quality assurance manuals referenced in that paragraph.

Contrary to this requirement, a review of the Fischbach and Moore nonconformance report log showed that 26 nonconformance items remain unresolved, 13 of which relate directly to deficient items identified during this inspection. Of the 26 unresolved items, one was outstanding for 10 months, one for 7 months, and nine others greater than 3 months. Three of the other items in the log, items 81, 87 and 91 were dispositioned by indicating that the items could be used as is, without any rationale or indication of corrective action taken.

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This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC 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) corrective actions which have been taken by you and the results achieved, 2) corrective actions which will be taken to avoid further noncompliance, and 3) the date when full compliance will be achieved.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By  
J. G. Davis

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John G. Davis, Deputy Director  
for Field Operations  
Office of Inspection and  
Enforcement