

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted June 1-30, 1980, it appears that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

1. Technical Specification 7.4.a, Procedures, Administrative Controls, requires in part that "written procedures shall be established, implemented, and maintained"
 - a. Overall Plant Operating Procedure I contains the Sealed Valve Check List which requires certain valves to be locked in position prior to plant startup. Section B.31.a contains the System Pre-operational Valve Check List for the Reserve Shutdown System which requires proper valve positioning prior to plant startup.

Contrary to the above, three valves required to be sealed in position were found on June 17, 1980 at 2:00 p.m. with no locking device (seal) with the Reactor at approximately 2% power.

- b. Administrative Procedure (ADM) No. 28 for Data Logs, Data Sheets, and Charts, Section 3.2 states in part that, "When the responsible person changes a chart or recorders, and once per shift, be sure that the recorder is inking At midnight stamp each chart with the new date. If the recorder or integrator is not working properly, write a Plant Trouble Report (PTR). . . ."

Contrary to the above, Storage Basin Recorder XVI 102-1 was observed not to be inking on June 12, 1980 at 7:40 a.m. The chart had been changed before midnight on June 11, 1980 and had been date stamped at midnight. However, the pen was not inking and had not been inking since the chart was changed and no PTR was written to indicate that the instrument was not inking properly.

This is an infraction.

2. Technical Specification 7.4.a.1 requires that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November, 1972.

Appendix A of Regulatory Guide 1.33, item i.c, requires procedures for equipment control.

Contrary to the above, none of the equipment control procedures established and maintained by the licensee were utilized to properly control the

removal from service or to indicate the status of pressure differential transmitter 2177-1 from approximately 10:30 a.m. to 5:15 p.m. on June 17, 1980.

This is an infraction.

3. Technical Specification LCO 4.2.9 requires the total helium leakage through all primary closure seals in any group of penetrations not exceed an equivalent leak rate of 400 lbs/day at a differential pressure of 10 psi and that the total helium leakage through all the secondary closure seals shall not exceed an equivalent leak rate of 400 lbs/day at the differential pressure of 688 psi.

Temporary relief from LCO 4.2.9 granted by NRR on June 5, 1980 to be in effect until the next refueling shutdown provides for relaxation to 700 pounds per day with certain administrative controls. Two of the controls are: (1) Radiation process monitors for the reheat steam system will be monitored once per shift for indication of primary coolant leakage into the secondary system and (2) check and record the interspace differential pressure once per shift to comply with LCO 4.2.7. Operations Order effective June 5, 1980 also placed these requirements in effect plus the recording of the results in the operators log.

Contrary to the above, data was not recorded for the interspace differential pressure and the Radiation process monitors for the reheat Steam System on the day shifts of June 10, 1980, June 16, 1980 and on the 12-8 shift of June 17, 1980.

This is an deficiency.