

APPENDIX A

NOTICE OF VIOLATION

Connecticut Yankee Atomic Power Company

Docket No. 50-213

Based on the results of an NRC inspection conducted on April 21-25, 1980, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC License No. DPR-61 as indicated below. Items A and B are infractions, and items C, D and E are deficiencies.

- A. Technical Specification 6.8.1 states, in part "Written procedures...shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USAEC Regulatory Guide 1.33...."

Regulatory Guide 1.33, Appendix A, paragraph E, states in part "... Each safety-related annunciator should have its own written procedure which normally contain the alarm setpoints and up to five or six items of corrective action per alarm."

ANSI N18.7-1972, 5.3.3 states in part "...Procedures correcting off-normal conditions should be developed for these events where system complexity may lend operator confusion...."

Contrary to the above, the following are examples of annunciator additions/changes where response procedures were not established/revised to reflect those additions/changes although the plant had been operating in the interim.

- Axial Off-Set, Plus-Minus
- High Volts per Hz
- Steam Trip Valve Air Reservoir, Low Pressure
- ANN 4.9-1, Unit Annunciator EG-2A
- ANN 4.9-2, Unit Annunciator EG-2B

- B. Technical Specification 6.8.1 states in part "Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972...."

The following are examples of instances where plant written procedures, administrative policies and the requirements of ANSI N18.7 were either improperly or inadequately implemented:

- (1) ANSI N18.7-1972, Paragraph 5.1.6 states in part "Maintenance that can affect the performance of safety-related equipment shall be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances...."

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Contrary to the above, the following maintenance activities designated as QA Category I (safety-related) were accomplished without using written procedures:

- Work Permit, MA-0899, Disassemble and Repair 1A Auxiliary Feed Pump Valve 1206-A
 - Work Permit, MA-0926, Replaced Emergency Diesel Generator 2A Air Start Drain Valve
 - Work Permit MA-0392, Replaced Reactor Coolant Pump Seal Bypass Valve
 - Work Permit, MA-0983, Replaced Charging Pump Main Lube Oil Pump
 - Work Permit, MA-0674, Remove Feedwater Regulation Valve in order to facilitate system testing
- (2) ANSI N18.7, paragraph 5.3.5(3) states in part "...Instructions shall be included or referenced, for returning the equipment to its normal operating status. Operating personnel shall place the equipment in operation and verify and document its functional acceptability...."

Further, procedure QA 1.2-11.3, "Retest/Test Requirements", paragraph 4.5 requires that when rework, repair, adjustment or modifications have been made to mechanical or electrical components or systems, the appropriate foreman or supervisor shall be responsible for establishing retest requirements and acceptance criteria to assure that the affected component or system shall function satisfactorily in operation.

Contrary to the above, the following maintenance activities which were designated as QA Category I (safety-related) were accomplished without performance of any post installation functional tests to prove acceptability of the maintenance:

- Work Permit, MA-0926, Replaced Emergency Diesel Generator 2A Air Start Drain Valve
 - Work Permit, MA-0983, Replaced Charging Pump Main Lube Oil Pump
 - Work Permit, MA-0674, Remove Feedwater Regulation Valve in order to facilitate system testing
- (3) Procedure QA 1.2-10.1, "Installation Inspections", paragraph 5.1 requires the following: "When work is being performed on QA systems, structures or components, the Job Supervisor shall be responsible for ensuring that installation inspections are performed as appropriate."

Contrary to the above, it appears that the following maintenance activities which were designated as QA Category I (safety-related) were accomplished without performing any post installation inspections:

- Work Permit, MA-0899, Disassemble and Repair 1A Auxiliary Feed Pump Valve 1206-A
 - Work Permit, MA-0926, Replaced Emergency Diesel Generator 2A Air Start Drain Valve
 - Work Permit, MA-0444, Change Boric Acid Filter
 - Work Permit, MA-0983, Replaced Charging Pump Main Lube Oil Pump
 - Work Permit, MA-0674, Remove Feedwater Regulation Valve in order to facilitate system testing
- (4) Procedure QA 1.2-8.2, "Material Issue", paragraphs 7.1 and 7.2 require that QA material be issued for QA maintenance work and that the Job Supervisor shall enter the QA material control number ("CYSN") on the work permit and that the QA Department shall ensure that the CYSN is written on the work permit.

Contrary to the above, the QA material serial number for material used for Work Permit MA-0926, Replacement of Emergency Diesel Generator 2A Air Start Drain Valve, was not recorded on the work permit.

- (5) Procedure QA 1.2-5.1, "Maintenance Work Requests and Work Permits", paragraph 6.2.13 requires the following:

"6.2.13 It is the originators responsibility to state whether or not there are QA requirements for the job. If "Yes" is checked off, the requirements stated requests the QA Department to perform an inspection, hold point, check or signature on the procedure or QA-QC Inspection Plan, the Work Permit is to be forwarded to QA for approval before being taken to the Control Room."

Contrary to the above, prior QA Department authorization for the following QA Category I Maintenance Work Permits were not obtained:

- Work Permit, MA-0899, Disassemble and Repair 1A Auxiliary Feed Pump Valve 1206-A
- Work Permit, MA-0788, Realign "A" Auxiliary Feed Pump

-- Work Permit, MA-0674, Remove Feedwater Regulation Valve in order to facilitate system testing

(6) Procedure QA 1.2-5.1, paragraph 6.2.2.3 requires the following:

"6.2.23 The QA Department shall review the Work Permit for:

- 1) Completeness
- 2) Use of QA material. It is the QA Department's responsibility to enter all CYSN numbers on the Work Permit
- 3) Test data sheets
- 4) Special process data
- 5) QA Inspection Plans
- 6) Housekeeping requirements
- 7) Fire Protection requirements

If a Work Permit is found incomplete it will be returned to originator.

Quality Assurance shall indicate their review by stamping the Work Permit with the designation "CY QA Concurrence" and sign the designation."

Contrary to the above, the QA Work Permit final review appears to be inadequate in that for all of the Work Permit discrepancies the work Permits had received QA review and sign-off.

C. Technical Specification 6.5.1.3 states "Alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PORC activities at any one time."

Technical Specification 6.5.1.5 states, "A quorum of the PORC shall consist of the Chairman and four members including two alternates."

Technical Specification 6.5.1.8 for PORC responsibilities states, in part. "The PORC shall maintain written minutes of each meeting...."

Procedure ADM 1.1-1 states, in part, the responsibilities of PORC as "Review of a) all procedures required by Specification 6.8 and changes thereto, b) any other proposed procedures or changes thereto...."

Contrary to the above, PORC meeting minutes were not adequately maintained and several items requiring PORC review, did not receive proper PORC review in that:

- PORC meetings held on February 28, 1980; November 28, 1979; and, February 13, 1979, did not accurately document the meeting attendees.
- A PORC meeting on February 13, 1979, was conducted without the required quorum; hence the following items reviewed at that meeting did not receive proper PORC review:
 - Technical Specification Change Request, #79-2 and #79-3
 - NOP 2.4-5, Draining an Isolation Loop
 - SUR 5.3-24, Dead Weight Tested PC-23C
 - SUR 5.1-47, CCW to Neutron Shield Tank
 - SPL 10.5-30, Testing of OT-2 Switch
 - FP-CYW-R8, Refueling Procedure
 - M 8.5-11, Boric Acid Filter
 - SPL 10.5-155, Welding and NDE Requirements

D. Technical Specification 6.8.1 requires in part "Written procedures and administrative policies shall be established, implemented and maintained...."

Technical Specification 6.10.1 requires in part "The following records shall be retained... a. Records...of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety...."

Procedure QA 1.2-5.1, "Maintenance Work Requests and Work Permits" requires, in part, the following:

- "6.2.22 The Shift Supervisor shall then forward the entire Work Permit Package to the QA Department. ALL WORK PERMITS SHALL BE TRANSMITTED TO THE QA DEPARTMENT...."
- "6.2.25 QA personnel shall forward completed Work Permits to the records supervisor for records control...."
- "6.2.26 The QA Department shall maintain traceability of Work Permits transmitted to them by the Shift Supervisor."

Contrary to the above, Work Permit documentation records for the following maintenance activities could not be located and were apparently not maintained:

- Work Permit, MA-0380, Monthly Electrical PMs, performed January 3, 1979;
- Work Permit, MA-0450, Monthly Electrical PMs, performed June 1, 1979;

- Work Permit, MA-0646, No. 2 Reactor Coolant Pump (RCP) Seal Replacement, performed September 30, 1979; and,
- SUR 5.5-1, "Testing of Pressurizer Safety Valves", Attachment No. 1, pressure setpoint data for Pressurizer Safety Valve No. 524 associated with Work Permit MA-0647, Repair of Pressurizer Code Safety Valve 524, performed September 29, 1979

E. Technical Specification 6.8.1 requires in part "Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972...."

ANSI N18.7-1972, paragraph 5.1 requires in part "...policies shall be provided to control the issuance of document { }...changes.... These policies shall assure that document { }...revisions or changes...are distributed to and used by the personnel performing the prescribed activity."

Procedure QA 1.2-61 7.1, states in part "To assure each document holder has received and inserted the change to that document, the Office Supervisor is responsible for issuing a transmittal form with each change issued.... The holder of document shall remove and destroy the superseded portion, insert changes...."

Contrary to the above, Procedure SUR 5.1-15, "Fire Protection System Tests", was performed on August 31, 1979; September 11, 1979; and, September 13, 1979, using Revision 4 of the procedure although a later revision was in effect. In addition, the following procedures located in the Control Room files and library did not have their current revisions posted:

- NOP 2.7-5, Purification of Refueling Cavity Water
- NOP 2.7-1, Processing Letdown Liquid
- NOP 2.12-1, Core Cooling System Lineup for Shutdown and at Power Operations
- NOP 2.2-2, Steady State Operation and Surveillance
- EOP 3.1-9, Total Loss of AC, and Surveillance Procedure SUR 5.5-14, "Feedwater Snubber Surveillance", which had been superseded by procedure SUR 515-11, had not been removed from the station procedure controlled copy files.