

Appendix A

NOTICE OF VIOLATION

Cincinnati Gas and Electric Company

Docket No. 50-358

Based on the results of an NRC inspection conducted August 1-29, 1980, it appears that certain of your activities were not conducted in full compliance with NRC requirements as noted below. These items are infractions.

1. 10 CFR 50, Appendix B, Criterion V requires in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Wm. H. Zimmer FSAR, Section 17.1.5.1 states in part: "Activities affecting the quality of the facility are accomplished in accordance with written instructions, procedures, or drawings . . ."

Contrary to the above:

- a. A revision to the residual heat removal (RH) system release for preoperational testing was promulgated without the use of the administratively controlled form prescribed in SU.ACP.15 revision 03.
 - b. Several instruments in the RH system were listed twice on the system release for preoperational testing which was not in accordance with SU.ACP.15 revision 03.
 - c. Physical inspection of approximately 1/3 of the RH system and all the Reactor Protection System components green tagged by the system release for preoperational testing revealed that about 10% of the tags were either missing or mutilated although procedural controls in SU.ACP.15, revision 03 require periodic field checks to ascertain the installation status of green tags.
2. 10 CFR 50, Appendix B, Criterion XIV requires in part: "Measures shall also be established for indicating the operating status of structures, systems and components of the nuclear power plant, such as by tagging valves and switches, to prevent inadvertent operation."

Wm. H. Zimmer FSAR, Sections 17.1.14.2 and 17.1.14.3 state in part: "QA&S is responsible for ensuring that procedures are established which indicate the operating status of structures, systems and components . . ." and, "the procedures . . . are documented and are audited by QA&S to ensure their proper performance."

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Contrary to the above:

- a. Eight RH system valves were identified which had not been included in the system release for preoperational testing.
 - b. Four RH system instruments were identified which had not been included in the system release for preoperational testing.
 - c. One RH system valve operator motor supply was identified which had not been included in the system release for preoperational testing.
 - d. Component green tags had been hung on adjacent piping rather than the component itself. Thus when the component was removed from the system for calibration, its tag remained.
3. 10 CFR 50, Appendix B, Criterion III, requires in part: "Measures shall be established to assure that applicable regulatory requirements and the design basis, . . ., for those structures, systems and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions."

Wm. H. Zimmer FSAR, Sections 17.1.3 and 17.1.3.6.1 state in part: "The design control reviews are conducted to ensure that the designs, . . ., are correctly translated into design documents such as specifications, drawings, procedures and instructions," and "Documents which are reviewed by GED and audited for compliance by QA&S consist of . . . GED design drawings and specifications . . . S&L design drawings, and . . . S&L Specifications."

Contrary to the above:

- a. Two valves listed in the Mechanical Department Valve List (MDVL) did not appear on the prescribed Sargent & Lundy (S&L) Piping and Instrument Detail drawing.
 - b. One valve was mislabeled on the S&L Control and Instrumentation Detail (C&ID) drawing.
 - c. Two valves shown on the S&L C&ID were not listed by the MDVL.
4. 10 CFR 50, Appendix B, Criterion XVI requires in part: "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 identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Wm. H. Zimmer, FSAR, Section 17.1.16.6 states in part: "When significant and/or repetitive conditions adverse to quality occur, they are reported to appropriate levels of CG&E and constructor management. Action taken to correct the cause of such conditions is also reported to appropriate levels of CG&E and constructor management . . ."

Contrary to the above:

The corrective action taken to ensure control of weld rod used for welding of safety-related components has been inadequate to meet requirements of FSAR and constructors special process procedures manual, Section 3.3, Revision 7, dated March 11, 1980, which requires weld rod warmers to be electrically energized at all times except during transport to and from the rod shack. On August 19, 1980, the inspector observed portable weld rod warmer IA-18, containing approximately 1/2 pound of low hydrogen weld rod, deenergized and unattended for at least 4 hours. This item is repetitive of previously identified items of noncompliance in weld rod control and is indicative that previous corrective actions taken have been inadequate.