

APPENDIX A
NOTICE OF VIOLATION

Connecticut Yankee Atomic Power Company

Docket No. 50-213

Based on the results of an NRC inspection conducted on October 6-10, 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 item C is a deficiency.

- A. Technical Specification 6.8.1 states, in part, "Written procedures ... shall be established, implemented and maintained ..."

Plant procedure QA 1.2-11.2, Paragraphs 5.1, 5.3, 6.2, 6.4, and 7.1 require, in part, that the department head review, evaluate, and approve by signature satisfactory test results; that unsatisfactory test results not be signed and be clearly identified on data sheets; and that approved test results be forwarded to the QA Department for review.

Contrary to the above, test data containing unsatisfactory results were approved by the department head; other test results were not reviewed or contained identified unsatisfactory data which were not evaluated to determine if it was acceptable or if corrective action would be required; and numerous tests were not forwarded to the QA Department for review; in that:

- For SUR 5.1-17, "[Emergency Diesel Generator 2A and 2B] Manual Starting and Loading Test" performed monthly January through October 1980, there were numerous instances in which data were recorded out of the normal value/range specified in the procedure; and, instances in which data required by the procedure were not recorded. In all but one instance these test results were signed as satisfactory by the department head. Additionally, there were 22 instances in which out of normal data were identified on test data sheets, in that the data entries were circled; however, no further evaluation was made to determine acceptability of the data or if corrective action would be required.
- For SUR 5.1-18, "Monthly Containment Recirculation Fan Damper Test and Filter Inspection" performed May 4, 1980, there were 24 instances of procedural steps that were not initialed as required by the procedure to verify satisfactory performance of these fans. This test was signed by the Department Head May 8, 1980.
- For SUR 5.1-4, "Hot Operational Test [Monthly Test of Emergency Core Cooling Pumps]", this procedure requires test equipment calibration sheets be attached. In no instance were the calibration data sheets attached for monthly tests completed January through September, 1980. In each instance except one, the tests were signed by the Department Head.

- For PM 9.1-9, "Fire Protection Equipment Inspection [Monthly]," inspections performed April, 1980; May, 1980; and June, 1980, the completed inspections were not signed by the Fire Hazards and Housekeeping Chairman as required by procedure. Additionally, the May, 1980 and June, 1980 completed inspections were not signed by the Operations Supervisor as required by the procedure.
- Numerous Surveillance Tests and Inservice Inspection Tests for 1979 and 1980 were being maintained by the Operations Department and had not been forwarded to the QA Department for review.

B. The following Fire Protection Systems surveillances required by Section 4.15 of the Technical Specifications were not properly implemented, in that:

- Technical Specification 4.15.B.1.b, which became effective February 6, 1978, requires in part, that at least once per 18 months (+ 25%) a flow test to assure no blockage, shall be performed for the CO₂ System Headers.

Contrary to the above, as of October 10, 1980, the following tests that were required to be completed by December 22, 1979 were either not performed or performed late:

- (1) Primary Auxiliary Building Charcoal Filters CO₂ Systems - not completed
- (2) Cable Vault System - completed June 16, 1980.

- Technical Specification 4.15.F.6.3, which became effective October 3, 1978, requires a visual inspection of each spray and/or sprinkler system nozzle at least once per 18 months \pm 25% to verify no blockage exists.

Contrary to the above, as of October 10, 1980, visual inspection of each spray and sprinkler system nozzles, which was required to be completed by August 19, 1980, had not been completed.

- Technical Specification 6.8.1 states, in part "Written procedures ... shall be established, implemented and maintained that meet or exceed the requirements of ... Appendix "A" of USAEC Regulatory Guide 1.33 ..."

- Regulatory Guide 1.33, Appendix "A", Paragraph H2 requires, in part, that written procedures be established for each surveillance test and inspection required by the Technical Specifications.
- Technical Specification 6.10.1.d requires that records of surveillance activities required by the Technical Specifications be retained for at least five years.

Contrary to the above, the following tests required every 18 months + 25% by Technical Specification 4.15.f.b.1 and 2 were accomplished by fire insurance company personnel but were not accomplished using approved procedures, and no records of the tests and inspections were retained:

- (1) Simulation of Automatic Activation of Fire Protection System Spray and/or Sprinkler System
- (2) Visual inspection of Spray System spray headers

- C. Technical Specifications 6.8.1 and 6.8.2 state in part "Written procedures and administrative policies shall be established and maintained ... [and] procedure ... changes shall be reviewed by the PORC and approved by the Plant Superintendent prior to implementation ..."

Plant Procedure QA 1.2-6.4, "Temporary Procedure Change (TPC)", paragraph 5.1 states in part, "When a deviation from a procedure is required, a temporary procedure change (TPC) shall be utilized ..."

Plant Procedure QA 1.2-5.2, "Procedure Format", paragraph 8.19 requires the use of test data sheets and paragraph 8.9 states, in part, "... the criteria against which the success or failure of the test will be judged will clearly be identified ... these will be qualitative criteria - a given event does or does not occur ... [or] ... quantitative values shall be designated as acceptance criteria."

Contrary to the above, changes to one procedure were made without obtaining proper review and approval and another procedure did not adequately provide for recording data or adequately specify acceptance criteria in that:

- Numerous pen and ink changes were made to plant procedure PM 9.1-9, "Fire Protection Equipment Inspection", performed September 11, 1980 without issuing a temporary procedure change nor obtaining PORC review and Plant Superintendent approval for the changes.

- Procedure SUR 5.5-15, "Semi-Annual Inspection of CO₂ Systems for Cable Vault and HEPA Filters and Halon System for Records Vault", steps 6.4 and 6.21 specify an acceptance criteria of not more than 10% loss for weight of CO₂ cylinders. However, the base weight for which the 10% criteria is applied is not specified or required to be recorded by the procedure. Additionally, the procedure does not provide for recording of the weights of the CO₂ cylinders.

- Procedure SUR 9.5-15, steps 6.7 and 6.24, require operation of pneumatic switches to ensure their proper operation but does not require documentation of proper operation of specific valves and dampers affected by these switches nor does the procedure specify any acceptance criteria for proper operation.