Appendix A

NOTICE OF VIOLATION

Cincinnati Gas and Electric Company Docket No. 50-358

As a result of the inspection conducted on February 24-26, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V states, in part, that "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."

   Startup Administrative Procedure SU.ACP.05, Revision 9, paragraph 6.3.2, 6.3.3 and 6.3.4 require that all preoperational tests be performed in accordance with the approved preoperational test procedure and in the specified sequence. Paragraph 6.7.1 requires that the systems engineer be aware that the initial conditions for each procedure intent section remain the same during that section of the test.

   Contrary to the above, during performance of test procedure PO-RD-2, "CRD Hydraulic," the systems engineer failed to verify that:

   a. Fuses 1C71-F21A and 1C71-F21B had been reinstalled prior to signing off on test procedure step 7.4.3.5.

   b. Fuses for relays K-21A and K-21B had been reinstalled to satisfy test prerequisite step 5.2.2.11 prior to the performance of the first two full core scrams.

   This is a Severity Level V violation (Supplement II).

2. 10 CFR 50 Appendix B, Criterion XI, states in part, that "Test procedures shall include provisions for assuring that . . . adequate test instrumentation is available and used . . ." 10 CFR 50, Appendix B, Criterion XII, states in part, that "Measures shall be established to assure that tools, gauges, instruments and other measuring and testing devices used in activities affecting quality are properly . . . calibrated . . . at specified periods to maintain accuracy within necessary limits."

   The FSAR, page C-29 states that testing of instrumentation and electrical equipment is in accordance with IEEE-336 and ANSI N45.2.4 (1972).

   The Quality Assurance Manual dated October 31, 1980, Section 11, Test Control, paragraph 11.2 requires that test procedures include test

instrumentation calibration requirements. Section 12, Control of Measuring and Test Equipment requires that test equipment be adjusted and calibrated at specified time intervals to assure the accuracy of instruments, gauges, and measuring devices used in the construction of the Zimmer Station.

IEEE 336, Section 2.5.2, states, in part, that "Measuring and test equipment used to determine compliance with specifications shall be adjusted and calibrated at prescribed intervals against certified equipment having known valid relationships to nationally recognized standards." Section 6.2.1 states, in part, that "Tests shall be performed to verify that the quality of installed equipment has not deteriorated during the construction phase" and that "Tests shall be made to assure that instrumentation and control channels are properly calibrated." IEEE Standard Dictionary of Electrical and Electronic Terms defines "calibrate" for nuclear stations as "Adjustment of the system and the determination of system accuracy using one or more sources traceable to the NBS." "System" is defined as "The entire assembled equipment excluding only the sample collecting pipe."

Contrary to the above:

The licensee's program for the control and calibration of measuring and test equipment during the preoperational phase of the plant prior to fuel loading does not include a requirement for performing periodic loop calibrations of essential test equipment or to loop calibrate this equipment within a reasonable time prior to its use.

This is a Severity Level V violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within twenty-five days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

MAY 29 1981
Dated

for C. E. Norelius, Acting Director
Division of Engineering and
Technical Inspection