

Appendix A

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-329

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As a result of the inspection conducted on April 28-30 and May 1, 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, "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."

Consumers Power Company Quality Assurance Program Policy No. 5, Revision 9, Paragraph 1.0, states, in part, "Instructions for controlling and performing activities affecting quality of equipment or operations during the design, construction and operation phases of nuclear power plants, such as ... construction, installation ... are documented in instructions, procedures, specifications, checklists and other forms of documents."

Contrary to the above as of May 1, 1981, the following instances of failure to develop appropriate procedures were identified:

- a. Appropriate procedures had not been developed for temporarily supporting cable and cable coils in that Bechtel Power Corporation Procedure FPE-4.000 "Installation of Electrical Cable", Revision 3, dated March 13, 1979, did not require that care be exercised to assure that the method of support of pulled or partially pulled cables would not result in damage to the cable jacket or exceeding the minimum bend radius criteria (Paragraph 6.7 of FPE-4.000). As a result, four cable jackets were damaged by the single coil of rope from which they were supported and two cables were supported such that the minimum bend radii were exceeded.
- b. Appropriate procedures had not been developed for the routing of cables into the equipment to which they are terminated in that Bechtel Power Corporation Procedure FPE-7.000 "Cable Terminations," Revision 7, dated December 26, 1979, did not establish measures to assure that the bend radius criteria (Paragraph 6.7 of FPE-4.000) were not exceeded. As a result, cable 1BB6404A was observed to be routed into Motor Control Center (MCC) 1B64 such that the minimum bend radius was exceeded.

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

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2. 10 CFR 50 Appendix B, Criterion X, states, in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Consumers Power Company Quality Assurance Program Policy No. 10, Revision 8, Paragraph 1.0 states, in part, "Inspection and surveillance are performed to assure that activities affecting quality comply with documented instructions, design documents and applicable codes and standards."

Contrary to the above, the electrical contractors QC inspections of cable termination activities on September 25, 1980, failed to verify conformance to Paragraph 3.1 of Project Quality Control Instruction E-5.0 which states, in part, "Verify that the cables ... are routed within the equipment without violation of minimum separation requirements ..." As a result, the violation of the 6 inch minimum separation requirement between class 1E cable 1AY001C and non-class 1E cables 1NB1705A and 1NA05001A was not identified.

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

3. 10 CFR 50 Appendix B, Criterion XV, states, in part, "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, ... disposition, and notification to affected organizations."

Consumers Power Company Quality Assurance Program Policy No. 15, Revision 9, Paragraph 3.2, states, in part, "When a nonconforming item or activity is discovered or observed during design and construction for the Midland Project, ... the responsible ... Consumers Power Organization assures that the condition is documented and that nonconforming items are tagged, marked, segregated, or controlled to prevent inadvertent use or installation ..."

Contrary to the above, on April 28, 1981, the inspectors identified 14 instances in which cable tray in the upper and lower cable spreading areas were not installed in accordance with the separation requirements delineated in the Midland FS-R and which had not been identified and controlled to prevent inadvertent use or installation. Furthermore, documentation, disposition and notification to all affected organizations of these nonconformances was not in accordance with the established Quality Assurance program requirements even though similar significant discrepancies had been identified 16 months earlier.

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

4. 10 CFR 50 Appendix B, Criterion III, states, in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in 50.2 and as specified in the license application ... are correctly translated into specifications, drawings, procedures and instructions."

Consumers Power Company Quality Assurance Program Policy No. 3, Revision 9, Paragraph 3.3, states, in part, "Each group or organization performing detailed design translates the applicable regulatory requirements, design bases, codes, standards and design criteria into design documents, such as: specification, drawings, ..."

The FSAR in Paragraph 8.3.1.3 states, in part, "All Class 1E equipment, with the exception of the main and local control boards, are marked with an adhesive-backed color coded symbol." IEEE279-1971, "Criteria for Protection Systems for Nuclear Power Generating Stations", in Section 4.22 states, in part, "In order to provide assurance that the requirements given in this document can be applied during the design, construction, maintenance, and operation of the plant, the protection system equipment ... shall be identified distinctively as being in the protection system. This identification shall distinguish between redundant portions of the protection system."

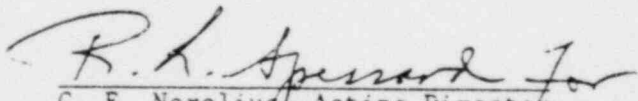
Contrary to the above, as of May 1, 1981, the above commitments had not been translated into specifications, drawings, procedures and instructions pertaining to the installation of field mounted Class 1E instrumentation.

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 thirty 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. Consideration may be given to extending your response time for good cause shown.

JUN 16 1981

Dated _____


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