

Appendix

NOTICE OF VIOLATION

Detroit Edison Company

Docket No. 50-341

As a result of the inspection conducted on February 14 through March 17, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), 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, and drawings." The licensee's Temporary Modification Procedure 4.7.2.01 contains instructions for controlling temporary changes to equipment design, including jumpers and lifted leads. Additionally, the Startup Manual requires that electrical jumpers and lifted leads be controlled by appropriate steps in applicable preoperational test procedures, and that the control room maintain a log or record of the installation and removal of jumpers and lifted leads.

Contrary to the above:

- a. On March 1, 1983, six instrumentation leads relating to Emergency Diesel Generator 11 were found disconnected for testing purposes without (1) being tagged as required by Procedure 4.7.2.01, (2) being controlled by the applicable preoperational test procedure (PRET.R3000.001 which controlled the testing in progress), and (3) the control room maintaining a log or record of the disconnection of the leads.
- b. Temporary Modification Procedure 4.7.2.01 contained two different instructions for the control of jumpers and lifted leads, allowing the use of two different types of control tags and the option of not controlling jumpers and lifted leads through control room logs or records.

This is a Severity Level IV Noncompliance (Supplement II).

2. 10 CFR 50, Appendix B, Criterion XI requires that the test program for systems and components be performed in accordance with written test procedures. This requirement is reflected in the Startup Manual and Chapter 14 of the FSAR. Preoperational Test Procedure PRET.R3000.001 "Emergency Diesel Generator Systems," requires that prerequisite valve and electrical lineups, auxiliary system filling and venting, and system operation be accomplished in accordance with Operating Procedure SOP 23.307.

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Contrary to the above, prior to testing on March 2, 1983, the starting air and fuel oil systems for Emergency Diesel Generator 11 were not properly lined up and filled/vented as per required by SOP 23.307. As a result, the engine experienced three repetitive start failures.

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

3. 10 CFR 50, Appendix B, Criterion XVI states in part that "Measures 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." This requirement is reflected in the Quality Assurance Manual, Startup Manual, and in the NOTE preceding the test procedure steps of Preoperational Test Procedure PRET.R3000.001, Section 6.0, "Procedure", which states "If the diesel generator should fail to start for any reason, a detailed explanation for the failure and corrective action shall be given in EDG 11 - Data Sheet B."

Contrary to the above, on March 2, 1983, the Emergency Diesel Generator 11 experienced four consecutive start failures and detailed explanations for the failures and corrective actions were not given in EDG 11 - Data Sheet B.

This is a Severity Level IV noncompliance (Supplement II).

4. 10 CFR 50, Appendix B, Criterion II states in part that "Activities affecting quality shall be accomplished under suitable controlled conditions...such as adequate cleanliness..." Section I of the Quality Assurance Manual requires that activities affecting quality be performed under suitable controlled conditions.

Contrary to the above, on March 15, 1983, cable trays containing safety related cables in a cable tray room adjacent to the auxiliary electrical room (relay room) were found to have rags, ropes, an electric fan, concrete expansion anchors, food waste, various lengths of conduit and small bore pipe, tools, wood debris, and other construction debris in them. This item of noncompliance is repetitive in that a violation for debris in cable trays was identified in Inspection Report No. 50-341/82-10.

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

5. 10 CFR 50, Appendix B, Criterion XV, states in part that "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, segregation, disposition, and notification to affected organizations." Paragraph 3.5.9 of the Quality Assurance Manual requires that nonconforming items be tagged or labeled.

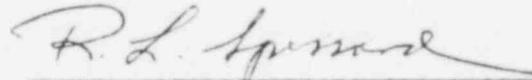
Contrary to the above, on February 1, 1983, several nonconforming DC power cables removed from the HPCI and RCIC systems were stored in the HPCI and RCIC rooms along with conforming cables and the nonconforming cables were not tagged, labeled, or segregated from conforming cables.

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

APR 27 1983

Dated



R. L. Spessard, Director
Division of Engineering