

Appendix

NOTICE OF VIOLATION

Wisconsin Electric Power Company

License No. DPR-24

License No. DPR-27

As a result of the inspection conducted on October 1-30, 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, 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." 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..."

Contrary to the above, the normally open motor operated discharge valve for the Unit 2 Train "A" high head safety injection pump was found to be shut while the plant was at full power. This condition rendered Train "A" inoperable. A shift turnover checklist, instituted to verify the status of key plant parameters and including a check of the position of the subject valve, failed to identify this condition.

This is a Severity Level IV violation (Supplement I).

2. Technical Specification 15.6.8.1 requires that, "The plant shall be operated and maintained in accordance with approved procedures" and identifies "Surveillance and Testing of safety related equipment" as activities requiring such procedural compliance.

Contrary to the above, Step 6.8 of Major Procedure TS-31, "High and Low Head Safety Injection Check Valve Leakage Test," was not complied with in that the valve lineup specified in the procedure as a prerequisite for performing the test was not established. This resulted in a reactor coolant system pressure transient and lifting of a PORV.

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

3. Technical Specification 15.6.8.1 requires that, "The plant shall be operated and maintained in accordance with approved procedures" and identifies surveillance and testing of safety related equipment as one area requiring such procedural compliance. Major Procedure IT-1010, "Ten-Year Pressure Test of the Boric Acid Storage Tank Piping," requires in Step 4.9 that "...chemistry verify boric acid storage tank boric acid concentration in all three tanks."

Contrary to the above, the inspector determined that this step was mistakenly signed off during swing shift on October 7, 1981, when the boric acid concentration in the tanks had not been determined as of 10:00 a.m. October 8, 1981.

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

4. Technical Specification 15.6.8.1 requires that, "The plant shall be operated and maintained in accordance with approved procedures," and identifies surveillance and testing of safety related equipment as one area requiring such compliance. Major Procedure IT-1002, "Ten-Year Pressure Test of Main Steam and Main Feed Systems," requires in Step 4.3 that valves MOV-4020 and MOV-4022 be shut. MOV-4020 and MOV-4022 are the cross-connect valves which isolate the Unit 2 steam generators from the auxiliary feedwater system.

Contrary to the above, the inspector noted that valves MOV-4020 and MOV-4022 were open rather than shut during the performance of Major Procedure Step 4.3 on October 10, 1981.

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

5. Technical Specification 15.6.8.1 requires that, "The plant shall be operated and maintained in accordance with approved procedures." Technical Specification 15.6.8.3 requires that, "Temporary changes to Major Procedures,...which do not change the intent of the original or subsequent approved procedure, may be made provided such changes to operating procedures are approved by the Duty Shift Supervisor and one of the Duty and Call Superintendents."

Contrary to the above, the 10 year pressure test of main steam and main feedwater systems was conducted at a pressure not in accordance with Major Procedure IT-1002 without processing a change to the procedure to reflect the intended, and technically justified, test pressure.

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

6. Technical Specification 15.6.8.1 requires that, "The plant shall be operated and maintained in accordance with approved procedures." Major Procedure HP 2.7, "Radiation Work Permits," requires in Step 7.2 a worker performing work covered by a radiation work permit (RWP) to assure that he has taken all the necessary precautions outlined on the RWP while performing the job. The RWP in effect for the work being performed required cotton gloves to be worn.

Contrary to the above, a worker was observed entering the Unit 1 "B" reactor coolant pump cubicle on October 15, 1981, without wearing

gloves. When this was brought to the attention of the worker by licensee Health Physics personnel he resisted complying with the requirement to wear gloves.

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

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.

DEC 15 1981

Dated _____

R. L. Spessard, Director
Division of Resident and
Project Inspection