

APPENDIX A

NOTICE OF VIOLATION

Louisiana Power and Light Company

Docket No. 50-382  
CPPR-103

Based on the results of an NRC inspection conducted during the period of December 16, 1981-February 15, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified.

Criterion V of 10 CFR 50, Appendix B, states that activities affecting quality shall be prescribed by instructions, procedures, or drawings of a type appropriate to the circumstances and that these activities shall be accomplished in accordance with these instructions, procedures, or drawings.

Startup Administrative Procedure SAP-37, "Joint Test Group," (JTG) requires that the JTG review preoperational (Phase II) test procedures and that during these reviews the JTG will ensure the adequacy of designated technical reviews. Designated technical reviewers are required by SAP-11 to verify that the procedure content is consistent with the test objectives, regulatory requirements, and commitments.

Contrary to the above, the NRC inspector observed during a procedure review that Preoperational Test Procedure SPO-59-001 was not consistent with these objectives, regulatory requirements, or commitments. Several examples identified during the review conducted between August 31, 1981, to January 11, 1982, are listed below:

1. Section 14.2.12.2.48.3.H of the FSAR states that the Phase II test for containment spray will verify an unobstructed flow path, using water and air with overlapping flow paths. Contrary to this, Preoperational Test Procedure SPO-59-001, "Containment Spray," does not check flow-thru valve 2CS-F305A either with water or air. In addition, the valve line-up did not list several valves that are in the flow path or boundaries to the flow path.
2. Section 14.2.4 of the FSAR requires that each procedure will include provisions to ensure that prerequisites are met.

Contrary to the above, this preoperational test procedure did not reference or list as prerequisites Containment Spray Flush Procedures, SFL-59-001 and SFL-59-002, or Prerequisite Testing Procedure SFG-59-001.

In addition, Paragraph 7.3.2 requires the testing of containment spray pump by pumping approximately 1740 gpm of water from the Refueling Water Storage Pool to the Reactor Coolant System; however, the status of the Reactor Coolant System is not addressed by the procedure.

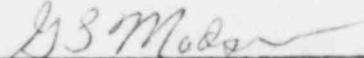
3. Paragraph 6.2 of Quality Assurance Procedure QP 11.1, "Test Control," requires that written procedures for conducting tests shall be sufficiently detailed to enable qualified personnel to perform all required tasks.

Contrary to the above, the preoperational test procedure SPO-59-001 for containment spray does not identify the instruments and switches on the Engineering Safety Features Panel (CP-8) by the same identification number and/or description that they are labeled with on the panel. Specific examples are included in the details of this report.

This is a Severity Level V Violation (Supplement II.E.).

Pursuant to the provisions of 10 CFR 2.201, Louisiana Power and Light Company is hereby required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including; (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of 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.

Dated March 18, 1982

  
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G. L. Madsen, Chief  
Reactor Project Branch 1