

Appendix

NOTICE OF VIOLATION

American Electric Power  
Service Corporation

Docket No. 50-315  
Docket No. 50-316

As a result of the inspection conducted on February 1 through March 13, 1982, 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...shall include appropriate quantitative or qualitative acceptance criteria for determining important activities have been satisfactory completed."

10 CFR 50, Appendix B, Criterion VII, states: "Measures shall be established to assure that purchased material, equipment, and services whether purchased directly or through contractors and subcontractors conform to procurement documentation." It also directs that, "the effectiveness of the control of quality contractors and subcontractors shall be assessed...at intervals consistent with the importance, complexity and the quantity of the product or services."

Plant Procurement Control, PMI 3010, states in part, "originators of purchase requisitions for materials, equipment, and/or services which are for nuclear grade application are responsible for selecting only those companies which are on the Qualified Suppliers List (QSL)."

Engineering/Performance Test Procedures, PMI 6040, directs that test equipment shall be identified and controls established to clearly identify the calibration status of test equipment used. This procedure also states in part that, "whenever any measuring device is found to be out of calibration, an evaluation shall be made and documented concerning the validity of previous measurements from the time of prior calibration."

Procedure 12 THP 6030 IMP.001, "Test Equipment Calibration Program for the D. C. Cook Nuclear Plant" states in part, "if the standard is found to be out of calibration during a periodic test, a documented evaluation utilizing the data sheet (as-found-data) will be made of the validity of all plant equipment tests performed with this equipment since its last acceptable calibration." The procedure also prescribes specific action to be taken when test equipment is found out of calibration more than once in succession.

Contrary to the above the following was noted:

Test equipment used to check:

- components used in the Thermal Power Measurements,
- ice condenser door surveillance, and
- containment purge rates

was either purchased from or serviced by vendors not on the QSL, and therefore had not been quality assured per plant criteria.

Some test equipment being calibrated (serviced) by offsite vendors lacked as-found-data, and had no documentation to show when their adjustments or repairs had been made to the test equipment during its calibration. This made it impossible to evaluate the safety implications of measurements taken with out of calibration equipment.

The items discussed above constitute a Severity Level V violation (Supplement I) and are combined as one item because they are related in nature.

2. Unit 2, Technical Specification 6.8.1 states in part: "written procedures shall be established, implemented, and maintained covering... surveillance and test activities of safety related equipment."

Hydrostatic Test Procedure, "\*\*12 MHP 5050 SPC.005," states in part, "that the test pressure is 1.10 times design pressure and that a safety relief valve should be set at 1.10 times test pressure to provide overpressure protection to the tested system."

Contrary to the above, while conducting a hydrostatic test on a portion of the No. 2 "E" Essential Service Water System, following repairs; the licensee failed to install a safety relief valve and did not reference the test procedure for the required test pressure until after 1.24 times the test pressure had been placed on the system.

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

3. 10 CFR 50, Appendix B, Criterion VI, states in part: "...Measures shall be established to control the issuance of documents such as instructions, procedures, and drawings, including changes thereto...;" and control distribution to the "...locations where the prescribed activity is performed."

Design changes Procedure No. PMI 5040, states in part, "...partially installed RFC's must be included on the "OP" drawings...in the part installed has been returned to operating status. The "OP" drawing must be revised...even if the entire RFC has not been completed."

Contrary to the above, the Unit 1 portion of design change RFC 12-2497, modification to the emergency leak off for the centrifugal charging pumps, was installed during the February, 1982 outage and the control room drawings were not brought up to date until after the Unit started up on March 3, 1982. The relocation of valves, lack of valve labels, and out of date drawings confused operators performing startup alignment checks on the system.

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

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.

\_\_\_\_\_  
Dated

\_\_\_\_\_  
R. L. Spessard, Director  
Division of Project and  
Resident Programs