

Appendix

SUPPLEMENTAL NOTICE OF VIOLATION

American Electric Power Service
Corporation

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

As a result of the inspection conducted on March 14 through April 30, 1982, and in accordance with the NRC Enforcement Policy, 47FR 9987 (March 9, 1982), the following violations were identified:

2. 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 their circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings." Section 17 of the licensee's FSAR commits to the guidance provided by ANSI N18.7-1976. ANSI N18.7-1976 Section 5.2.7.1 states in part; "Maintenance shall be....planned so as not to compromise the safety of the plant. Planning shall consider the possible safety consequences of.... sequential maintenance....activities....maintenance shall be performed in a manner such that license limits are not violated."

Contrary to the above, the Job Order System administrative controls did not contain adequate provisions to assure that consideration was given to the possible safety consequences of draining, isolating, and adding unborated water to the Boron Injection recirculation lines and Boric Acid flow path during Unit 2 maintenance activities conducted on April 19 through April 22, 1982.

3.a. (Deleted)

- 3.c. Technical Specification 6.8.1 requires that procedures be established as recommended by Appendix "A" of Regulatory Guide 1.33, November, 1972. Section I of that guide states, in part, "Maintenance which can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with written procedures...."

Contrary to the above, no written procedure existed to outline the initial and final conditions, the precautions to be observed, coordination of the troubleshooting, and the acceptable methods for unblocking plugged boric acid lines.

Commitments made concerning the above revised items of noncompliance appear adequate to correct and prevent recurrence. Consequently, no additional reply to these items of noncompliance is required and we will review these actions during a future inspection.

September 7, 1982
Dated

James G. Keppeler
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