

NOTICE OF VIOLATION

Wisconsin Electric Power Company

Docket No. 50-301  
License No. DPR-27

As a result of the inspection conducted on October 22, 1990 through January 2, 1991, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1990) (Enforcement Policy) the following violation was identified:

10 CFR Part 50, Appendix B, Criterion XI states, in part, that "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. . . . Test results shall be documented and evaluated to assure that test requirements have been satisfied."

Contrary to the above, the post-modification test performed for modification 88-172, "Add accumulators to the Instrument Air Supply (IA) to the crossover steam dump valves," was not documented as required by the test procedure, nor were the acceptance criteria provided in the test procedure pertinent for the actual test pressure used (60 psig). The test procedure was written for and the acceptance criteria based on the assumption that the crossover steam dump valves could be operated with 30 psig air pressure. A pressure of 60 psig was required to operate the valves. Since the acceptance criteria for the accumulator check valves was based on the assumption that the valves would operate at 30 psig vice the 60 psig actually required, and the leak rate at 60 psig was not documented, it is not known how long the crossover steam dump valves could be considered operable after the loss of IA.

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

Pursuant to the provisions of 10 CFR 2.201, Wisconsin Electric Power Company is 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 violation: (1) the corrective steps that have been taken and the results achieved; (2) the corrective steps that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

1-16-91  
Dated

Thomas M. Burdick  
Thomas M. Burdick, Chief  
Operations Branch