

Appendix

NOTICE OF VIOLATION

Toledo Edison Company

Docket No. 50-346

As a result of the inspection conducted on June 14-18, 22-25, July 6-9, 20-23, 27-30 and August 3, 11-13, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. Technical Specification 6.8.1 requires that written procedures stated in Appendix "A" of Regulatory Guide 1.33, November 1972 shall be established, implemented and maintained.
  - a. Toledo Edison Maintenance Procedure 1410.34, Section 6.1.1, states in part, "hangers and supports shall be seismic class 1 type as specified in standard E-302A."

Toledo Edison Maintenance Procedure 1410.35, Section 6.2.3, states in part, "Conduit shall not be supported from pipes, ductworks...or their supports unless specifically allowed by the drawings for that particular run."

Contrary to these requirements, the inspector observed the following circumstances:

- (1) The inspector observed that safety related conduit No. 3808C, which connects to transmitter LIT 4618, was supported from a non-class 1E hanger with other non-safety pipes and ducts.
  - (2) Support and mounting hardware for the class 1E conduit identified above in (1), was not in accordance with Bechtel Standard E-302A. In addition, no drawing or instructions had specifically allowed the observed configuration.
- b. Toledo Edison Maintenance Procedure 1410.23.1, Installation Procedure for Pulling of Essential Cable, Section 6.3.8, states in part, "...cables shall not be left coiled unprotected on the floor."

Contrary to the above, during the week of July 12-16, 1982, four class 1E cables were observed to be lying on the cable spreading room floor without proper support or protection to prevent damage to the partially pulled cables. In addition, on July 14, 1982, coiled cable in the control room was not properly supported at the end of the work activities for that day.

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

2. 10 CFR, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality, such as... deficiencies, deviations...and nonconformances are promptly identified and corrected."

Toledo Edison Nuclear Quality Assurance Procedure 2160, Revision 9, states in part, "Toledo Edison, its agents...are responsible for implementing corrective action procedures which require that conditions adverse to quality be identified, reviewed and promptly corrected."

- a. Contrary to the above, the licensee failed to document an item of noncompliance regarding adverse conditions caused by supporting class 1E conduit 38080C from a non-seismic hanger. This item had been previously identified by the inspector and brought to the attention of the licensee. However, corrective action was subsequently, not accomplished in accordance with written procedures. The following violations of the above requirements were determined.
- (1) Conduit 38080C had been properly installed. However, it was apparently reworked without benefit of quality documentation.
  - (2) After the inspector identified the circumstances outlined in (1) above, the licensee took corrective action. However, the restoration of conduit 38080C to its proper hanger 13514-4025E, was not accomplished in accordance with documented and approved procedures or instructions.
- b. Toledo Edison Nuclear Construction Department Procedure (NCDP) 6080.01, Revision 2, states in part, "Whenever an item is separated from its identification, such as...cutting off a piece of cable from a reel, the identification such as a purchase order number... shall be transferred to each marked piece. Material not identified to the purchase order shall not be permitted to be used."

Contrary to this requirement, the licensee failed to take corrective action or establish measures to determine whether cables already cut from their reels, and issued under FCR numbers before March, 1982 could be identified or determine what impact this lack of identification could have on safety. The following cables were determined not to have traceability to a unique and specific document attesting to its quality: 2CINCRTMA, 2CINCRTMG, 2LPT4587A, 1LPT4587B, 2LPT4588A, 2LPT4588B, 2CBF1285J, 2CBF1285M, 1CV40608AA, 2LTRC3A6B, 2 LTRC3B6B, 2LF4631M, 2LCT4594B, 2LLE4617C, 1LLT4595A, and 1LLT4595C.

This is a Severity Level IV violation (Supplement II)

3. 10 CFR 50, Appendix B, Criterion III, states in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis...for those structures, systems and components to which this appendix applies are correctly translated into specifications...and instructions. These measures shall include provisions to assure that appropriate standards are specified and included in design documents and that deviations from such standards are controlled."

Contrary to the above, the licensee failed to implement measures to assure that applicable regulatory and design basis requirements were specified and that deviations from such standards were documented and controlled for certain Post-Three Mile Island (TMI) modifications.

Removal of the seismic specifications from the procurement documents for FCR's 79-409, 79-425, and 79-430 were not accomplished in accordance with documented and approved procedures or instructions. Consequently, failure to document the design changes resulted in QA inspectors approving the instrumentation without the seismic qualifications, as required by NUREG-737. The licensee failed to control design changes for the following instrumentation:

- a. Containment Wide Range Water Level Indication (FCR-79-409).
- b. Containment Wide Range Pressure Indication (FCR-79-425).
- c. Safety Grade AFW Flow Indication (FCR-79-430).

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

4. 10 CFR, Appendix B, Criterion V, states in part, "Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Toledo Edison Nuclear Quality Assurance Procedure 2050, Revision 4, states in part, "Approved written procedures/instructions shall be developed which require that these documents...be complete, current and contain sufficient quantitative (such as dimensions, tolerances...) and quantitative...acceptance criteria as appropriate to verify satisfactory work performance."

Contrary to the above, a satisfactory qualitative or quantitative criteria for attributes such as slope, etc. were not properly delineated on drawings, procedures or instructions (which are readily accessible to QC inspectors) for verifying instrument line installation. On May 6, 1982, a QC inspector verified that pressure transmitter instruments PT-4587 and PT-4588 were installed in accordance with drawings J-801 sheets 1 and 2 and Field Change Notice (FCN) 2022 but was not aware of slope requirements since the drawings did not include that information.

Furthermore, the licensee had already issued Vendor Drawings Change Notice M329-624-11 to correct drawing discrepancies and FCR 416-82 to correct instrument tubing dimensions, but neither addressed or determined what the proper slope of the line should have been for the instruments.

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

5. 10 CFR, Appendix B, Criterion X, states in part, "A program for inspection of activities affecting quality shall be executed...to verify conformance with the documented...drawings for accomplishing the activity.

Toledo Edison Nuclear Quality Assurance Procedure 2100, Revision 3, states in part, "This procedure establishes the requirement for inspections performed to verify conformance to the approved written instructions...and drawing for accomplishing the activity being inspected."

Contrary to the above, transmitters FT4630 and FT 4631 instrument lines were not installed per Bechtel isometric drawing J-904, SH.1, Revision OB, although a Post Inspection Construction Authorization verifying installation of the transmitters had already been signed off by QC on May 4, 1982.

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

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. Consideration may be given to extending your response time for good cause shown.

11-2-82  
Dated

Original signed by C.E. Norelius  
C. E. Norelius, Director  
Division of Engineering and  
Technical Programs