

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 June 10 through July 2¹~~0~~, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

Unit 1

1. Unit 1 Technical Specification 3.5.4.2 states: At least two independent channels of heat tracing shall be OPERABLE for the boron injection tank and for the heat traced portions of the associated flow paths.

Applicability: MODES 1, 2 and 3.

Action:

With only one channel of heat tracing on either the boron injection tank or on the heat traced portion of an associated flow path OPERABLE, operation may continue for up to 30 days provided the tank and flow path temperatures are verified to be > 145° F at least once per 8 hours; otherwise, be in HOT SHUTDOWN within 12 hours.

Contrary to the above, on June 16, 1983 at about 1500 operators became aware that the B train of heat trace circuit No. 262 (Boron Injection Tank inlet) was an open circuit. This discovery was a result of a job order written on June 12, 1983 when a problem with the circuit maintaining temperature was identified but it was not declared inoperable. The ACTION requirement to verify temperature to be > 145° F every 8 hours was not carried out and the Unit continued operating in Mode 1.

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

Units 1 and 2

2. 10 CFR 50.54(a)(2) states: Each licensee described in Paragraph (a)(1) of this section shall by June 10, 1983, submit to the appropriate NRC Regional Office shown in Appendix D of Part 20 of this chapter the current description of the quality assurance program it is implementing for inclusion in the Safety Analysis Report, unless there are no changes to the description previously accepted by NRC. This submittal must identify changes made to the quality assurance program description since the description was submitted to NRC. Should a licensee need additional time beyond June 10, 1983 to submit its current quality assurance program

description to NRC it shall notify the appropriate NRC Regional Office in writing explain why additional time is needed, and provide a schedule for NRC approval showing when its current quality assurance program description will be submitted.

Contrary to the above, the licensee did not submit a current description of the quality assurance program it is implementing nor was an extension beyond June 10, 1983 requested in writing.

The previous NRC accepted quality assurance program description was reflected by Amendment No. 82, dated November 1978, to the FSAR. Examples exist of changes to the description which warrant a revised description.

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

3. 10 CFR 50, Appendix B, Criterion II states in part.. "This [Quality Assurance] program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures or instructions...The program shall take into account the need for special controls, processes, test equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection and test."

Donald C. Cook Units No. 1 and 2 FSAR Section 1.7.19.2 describes the quality assurance program and commits to comply with the requirements of Regulatory Guide 1.58 and ANSI Standard N45.2.6-1973. Commitments and exceptions to the revisions of the requirements concerning Qualifications of Inspections, Examination, and Testing Personnel were revised by letter dated September 14, 1981 (AEP:NRC:00567).

Contrary to the above, requirements the licensee committed to in the 1973 and 1978 version of ANSI N45.2.6 were not implemented by written policies, procedures, or instructions. These include:

- a. Certification of personnel qualification
- b. Documented determination of activities individuals are certified to perform
- c. Initial and periodic evaluations of job performance
- d. Specification of required physical characteristics
- e. Maintaining records of the above

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

AUG 5 1983

Dated _____

W D Shafer
W. D. Shafer, Chief
Projects Branch No. 2