

Appendix

NOTICE OF VIOLATION

The Detroit Edison Company

Docket No. 50-341

As a result of the inspection conducted on August 3 through September 16 and October 5, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 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, drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled." FSAR, Section 8.3.1.1.9, states in part, "The 120/120 Vac, 15 kva, regulated power for instrumentation loads, has an output variation of ± 0.5 percent for input variations of +10 percent, -20 percent." Test and Startup Administrative Procedures Manual, Section 4.9.6, states in part, "After receipt of a written reply from Edison Engineering to the Startup Field Report (SFR), the design change may be made permanent when the required design change document is issued." CAIO Procedure, CAIO.000.137, states in part, "The required output setvoltage shall be $120 \pm .25$ Vac."

Contrary to the above, the following instances were noted during the review of preoperational test results for Instrument and Control Power System Preoperational Test, PRET R3100.001 where management controls failed to assure that appropriate quality standards are specified and included in design documents, and to control deviations from such standards.

- a. Contrary to the FSAR, Section 8.3.1.1.9, the preoperational test results were accepted with an acceptance criterion that deviated outside the FSAR requirement without an appropriate request for a permanent revision to the FSAR.
- b. Contrary to the CAIO procedure, a incorrect value was recorded for the required set voltage and was subsequently accepted by startup, and audited and accepted by Quality Assurance.

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

2. 10 CFR 50, Appendix B, Criterion XI, states in part, "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." The vendor manual for the safety related battery chargers (C&D battery) requires that after a modification or corrective maintenance is performed, the chargers have to be re-balanced.

Contrary to the above, the licensee's preoperational, CAIO, and maintenance procedures did not incorporate the requirement to re-balance the safety related battery chargers after modification or corrective maintenance had been performed.

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

3. 10 CFR 50, Appendix B, Criterion XI, states in part, "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...". Startup Instruction 8.4.2.03, Section 4.4.1, states in part, "The following situation will require generic CAIO retesting...corrective maintenance performed after original CAIO testing has been completed."

Contrary to the above, the generic CAIO retesting was not done for the Division 1, safety related spare battery charger (2A1-1) after corrective maintenance was performed.

This is a Severity Level IV 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.

OCT 21 1983

Original Signed by R. L. Spessard

Dated _____

R. L. Spessard, Director
Division of Engineering