

Appendix

NOTICE OF VIOLATION

Union Electric Company

Docket No. 50-483

As a result of the inspection conducted April 23 through June 1, 1984, and in accordance with NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, as implemented by SNUPPS Quality Assurance Programs for Design and Construction, Section 17.1.5, and Start-up Administration Instruction, SAI-5, requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

Contrary to the above, during the performance of CS-03BG06, CVCS System Hot Preoperational Test, the test procedure was changed in five instances without the use of a Minor Change Notice as required.

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

2. 10 CFR 50, Appendix B, Criterion II, as implemented by commitment in SNUPPS-C FSAR, Appendix 3A, to Regulatory Guide 1.33 (endorsing American National Standards Institute N18.7-1976) requires that activities affecting quality be accomplished under suitably controlled conditions.

Contrary to the above, engineered safety feature pump and fan motor start limitations were not found in applicable system or plant operating procedures in the control room. Personnel contacted in the control room were not cognizant of the limits by training or experience and on one occasion the safety injection pump was started from the control room in violation of the manufacturer's recommended limitations for the motor.

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

3. 10 CFR 50, Appendix B, Criterion V, as implemented by SNUPPS Quality Assurance Programs for Design and Construction, Section 17.1.5; Westinghouse site instruction, "Processing and Control of Nonconformance Reports - NSSS Equipment"; and Bechtel site instruction, EDPI 4.70-01, requires that activities affecting quality be performed in accordance with documented instructions of a type appropriate to the circumstances, specifically, that documentation be provided for disposition of nonconformance conditions.

Contrary to the above, Bechtel and Westinghouse site instructions for the processing and control of nonconformance reports were not followed in the processing of eight Startup Field Reports (SFRs) dispositioned "use-as-is"

in that sufficient information explaining the rationale for the recommendation was not provided and records documenting the disposition of six of the nonconformances were not generated as required by procedures.

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

4. 10 CFR 50, Appendix B, Criterion XI, as implemented by SNUPPS Quality Assurance Programs for Design and Construction, 17.1.11, requires that test results be documented and evaluated to assure that the test requirements have been satisfied.


Contrary to the above, the test results packages for preoperational tests CS-03BG05, Boric Acid Blending, and CS-03BG06, CVCS System Hot Preoperational Test, did not receive adequate evaluation and/or documentation of the acceptability of the test results in that they were reviewed and approved with acceptance criteria which were obtained with unreliable gages and test data which exceeded its expected values.

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

With respect to item 1, the inspection showed that action had been taken to correct the identified item of noncompliance and to prevent recurrence. Consequently, no reply to this item of noncompliance is required and we have no further questions regarding this matter. With respect to items 2, 3 and 4, 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.

JUN 25 1984

Dated \_\_\_\_\_

  
R. L. Spessard, Director  
Division of Engineering