

NOTICE OF VIOLATION

Toledo Edison Company  
Davis-Besse Nuclear Power Station

Docket No. 50-346  
License No. NPF-3

During an NRC inspection conducted on November 4, 1991, through January 30, 1992, a violation of NRC requirements was identified. In accordance with the "General State of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, as implemented by the Toledo Edison Nuclear Quality Assurance Manual, Quality Requirement 5.4.1.2, requires that activities that affect quality shall be prescribed by clear and complete documented procedures and instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these documents.

- a. Control Work procedure DB-PN-00007, Rev. 1, Attachment 26, requires, in part, that modification training requirements have been met and that functional tests, such as calibrations, have been completed before signing off the specific requirement.

Contrary to the above:

- (1) The maintenance work order (MWO) Verification Checklist for MWO 2-90-0059-03, had Block 2 signed and dated October 4, 1991, indicating that training requirements had been met. However, 12 reactor operators/senior reactor operators did not receive their training until October 9 - 10, 1991.
  - (2) The MWO Verification Checklist for MWO 2-90-0078-05, affecting modification 90-0078 had Block 5 signed and dated October 13, 1991, indicating that all functional tests had been completed. However, the calibration phase of the level transmitters was not completed until November 2, 1991.
- b. Potential Condition Adverse to Quality Reporting (PCAQ) procedure NG-QA-00702, Rev. 2, step 6.1.5 requires that a new PCAQ be generated if additional potential conditions adverse to quality are found that violate the same requirements addressed in an existing PCAQ, and the existing PCAQ has been closed or sent to Document Systems. Step 6.1.7 requires that if the existing PCAQ is still open, the new condition be identified as a continuation sheet of the original PCAQ.

Contrary to the above, neither a new PCAQ nor a continuation sheet to PCAQ 91-0521 was written as a result of the No. 2 emergency diesel generator failure to develop rated voltage within 10 seconds on November 8, 1991.

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

Pursuant to the provisions of 10 CFR 2.201, Toledo Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555 with a copy to the U.S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Glen Ellyn, Illinois  
this 6<sup>th</sup> day of February, 1992

T. J. Miller for  
H. J. Miller, Director  
Division of Reactor Safety