

Appendix

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-255

As a result of the inspection conducted on April 25 through May 17, 1984, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, as implemented by the Quality Assurance Program (CPC-2A) which includes a commitment to ANSI N18.7-1976, requires that activities affecting quality be prescribed by documented instructions and procedures which include appropriate qualitative and quantitative acceptance criteria and be accomplished in accordance with those instructions and procedures.

Contrary to the above, the following examples of failure to have or follow appropriate procedures were identified:

- a. No acceptance criteria, as required by ANSI N18.7-1976, paragraph 5.3, were specified in either surveillance procedure RM-45 or Wyle test procedure No. 6108-545 for surveillance activities of mechanical snubber operability.
- b. The responsible supervisor failed to sign the Acceptability Criteria and Operability Checklist indicating that safety system settings had not been violated during the performance of Surveillance Procedure #MO-3 ("Reactor Protection Matrix Logic Tests") performed in June, July, and August of 1983 as required by Palisades Administrative Procedure 9.23, Paragraph 6.4.

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

2. 10 CFR 50, Appendix B, Criterion XV, as implemented by Section 15 of Consumers Power Quality Assurance Program Description for Operational Nuclear Power Plant (CPC-2A) requires measures to be established to control materials, parts or components which do not conform to requirements in order to prevent their inadvertent use or installation. Appendix A of CPC-2A states the Consumers Power Quality Assurance Program complies with Regulatory Guide 1.38, Revision 2 which endorses ANSI N45.2.2-1972, "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water Cooled Nuclear Power Plants."

Contrary to the above, Consumers Power Quality Assurance Program and its implementing procedures do not require a technical justification be prepared and documented for the conditional release of a nonconforming

item for installation. This documented technical justification prior to installing a nonconforming item is required by ANSI N45.2.2, paragraph 5.3.3.

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

3. 10 CFR 50, Appendix B, Criterion IV as implemented by Section 4 of Consumers Power Quality Assurance Program Description for Operational Nuclear Power Plant (CPC-2A) requires measures to be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in documents for procurement.

Contrary to the above, purchase order 1004-3428-C0, for the spare boric acid pump motor, did not specify adequate technical and quality requirements. Also include in your response to this item, the procurement of safety-related items from suppliers not on the Nuclear Operations Department Approved Suppliers List.

This is a Severity Level V 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. It shall include, 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 29 1984

Dated _____

Roger D. Walker

R. D. Walker, Chief
Engineering Branch 1