

Appendix A

NOTICE OF VIOLATION

Toledo Edison Company
Davis-Besse 1

Docket No. 50-346

As a result of the inspection conducted on April 23-27, May 1-4, and May 8-11, 1984, and in accordance with the NRC Enforcement Policy, FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, as implemented by Toledo Edison Quality Assurance Program as described in Section 17.2.5, including a commitment to ANSI N18.7-1972, requires that activities affecting quality be prescribed by documented instructions and procedures. Section 5.1.5 of ANSI 18.7-1972, and Section 1.C.6 of NUREG-0737, require independent verification of tagging activities relative to removal from and return to service of plant equipment.

Contrary to the above, no procedure or requirement existed for independent verification of tagging plant equipment out of service.

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

2. Technical Specification, Sections 6.5.1.6.d and 6.5.1.7.a, require the Station Review Board to review all proposed changes or modifications to plant systems or equipment that affect nuclear safety and recommend written approval or disapproval of changes or modifications to the Station Superintendent.

Contrary to the above, temporary modifications associated with nonconformance reports NCR-232-81, (Limitorque Valve Modification), NCR 392-81 (Service Water Valve Modification), and NCR 83-01 (Auxiliary Feedwater Pump Steam Line Modification) were not reviewed by the Station Review Board and a recommendation concerning the modification's acceptability was not made to the Station Superintendent.

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

3. 10 CFR 50, Appendix B, Criterion XVII, as implemented by the Toledo Edison Operating QA Program and the FSAR Section 17.2, require that the applicant shall provide record storage consistent with applicable regulatory requirements. The Toledo Edison QA Program commits to ANSI N45.2.9-1974 and Regulatory Guide 1.88, Revision 2, October 1976, with an exception specifying a two hour fire protection rating for record storage facilities.

Contrary to the above, records of audits, auditor and QC inspector qualification/certification and calibrations were not provided the required protection.

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

4. 10 CFR 50, Appendix B, Criterion XVI, as implemented by the Toledo Edison's Operational Quality Assurance Program, requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, five open Nonconformance Reports were noted with temporary fixes or dispositions for short term use. These temporary conditions had existed for a period of one to five years. Additionally, two Corrective Action Requests, written in 1982 with 1983 scheduled completion dates, were still open at the time of this inspection.

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

5. 10 CFR 50, Appendix B, Criterion XII, as implemented by the Toledo Edison Operational Quality Assurance Program, requires that measures be established to assure that tools, gages, instruments and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated and adjusted at specified periods to maintain accuracy within necessary limits.

Contrary to the above, test and measuring equipment available for use by the Quality Control Department was not controlled and calibrated as required.

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

6. Davis-Besse Nuclear Power Station Technical Specification for Reactor Coolant System Chemistry, Section 3.4.7, requires that the reactor coolant system chemistry shall be maintained within the steady state limit for chlorides of ≤ 0.15 ppm.

Contrary to the above, the chloride concentration in the reactor coolant system exceeded the limit, to a maximum of 0.26 ppm, for a total of 22 hours. The underlying cause was determined to be the premature breakdown of recently installed resin in the purification demineralizers as a result of the following:

- a. Purchase of the resin was uncontrolled as a non-Q item with no receipt inspection or testing, allowing an unacceptable type of resin to be installed in the demineralizers.
- b. Failure to follow procedure LI 4782 which specified the resin chemical and physical requirements.

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

7. 10 CFR 50, Appendix B, Criterion II states in part, "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

