Appendix

NOTICE OF VIOLATION

The Cleveland Electric Illuminating Company (CEI)

Docket No. 50-440 Docket No. 50-441

As a result of the inspection conducted on April 9-12 and June 4-7, 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 X, as implemented by CEI Corporate Nuclear Quality Assurance Program Manual, Section 1000, Revision 3, requires that a program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures and drawings for accomplishing the activity. The following examples were contrary to the above:
 - a. Inspection Reports documenting inspections performed on rework done on the Power Generation Control Console are in some instances not clear and do not specify what was inspected and what was acceptable. Examples include inspection reports on FDI-WNBE and Engineering Changes Notices 245B.
 - b. Inspection Reports verifying corrective action taken on LKC Nonconformance Report 2375 contained discrepancies such as the date of review being a day earlier than the date of inspection and the date of calibration of crimping tools used to crimp the termination lugs.
 - c. Inspection Reports verifying corrective action on LKC Nonconformance Reports 2568 and 2569 contained misleading CEI "Hold" point stamps which were signed and dated several days after the actual inspection was performed. Such a practice renders it difficult to readily verify whether the hold point was honored.
 - d. General Electric Product Quality Certificates (PQC) certifying the compliance of Namco Limit Switches intended for mounting on the Control Valves for the steam turbine, were accepted during receipt inspection even though the serial numbers of the limit switches were not furnished on the PQC to establish traceability.

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

2. 10 CFR 50, Appendix B, Criterion III, as implemented by CEI Corporate Nuclear Quality Assurance Program Manual, Section 0300, requires that, CEI perform a design coordination function consisting of selected reviews and design control monitoring programs verifying that these procedures shall assure that design activities are conducted in a planned and systematic manner; that the Perry Safety Analysis Report requirements have been appropriately addressed in design documents; and that design requirements can be controlled and inspected and/or tested to specified acceptance criteria.

Contrary to the above, CEI failed to assure that Gilbert Associates, Inc. (GAI) adequately reviewed and verified that safety related schematic and wiring diagrams relating to Standby Liquid Control, Residual Heat Removal and Process Radiation Systems were correct in that numerous design errors and inconsistencies were identified.

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.

AUG 1 4 1984

Dated

W. S. Little, Chief for Engineering Branch