

Appendix

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-255

As a result of the inspection conducted during the period October 1-19, 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. Palisades Technical Specification 4.3, "Systems Surveillance," states that the inservice testing of pumps and valves be performed in accordance with Subsections IWP and IWV of Section XI of the ASME Boiler and Pressure Vessel Code as required by 10 CFR 50.55a(g). Subsection IWV-3300 of Section XI of the Code states, "Valves with remote position indicators shall be observed at least once every 2 years to verify that valve operation is accurately indicated." Subsection IWV of the Code also defines required testing as that which demonstrates "that the moving parts of a valve function satisfactorily" and verifies valve "operational readiness."

Contrary to the above,

- a. The licensee failed to perform required surveillance testing in that accessible valve exercise testing was not observed locally to assure that control room indicating lights used for valve stroke timing were an accurate representation of valve operation.
- b. Limiting values for valve stroke times were selected that would not meet the intent of the Code in assuring that a valve is functioning satisfactorily or in requiring corrective action to assure valve operational readiness.

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

2. Criterion XII of 10 CFR 50, Appendix B, as implemented by Consumers Power Company "Quality Assurance Program Description for Operational Nuclear Power Plants," Section 12, requires calibrated equipment to be used in "activities affecting quality."

Contrary to the above, inservice testing procedures MO-24, SO-9 and QO-6 prescribe the use of noncalibrated stopwatches for surveillance testing. Other surveillance test procedures did not require use of calibrated stopwatches.

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

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Q PDR

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.

Nov 15, 1981  
Dated

W. S. Little  
W. S. Little, Chief  
Engineering Branch