

Appendix

NOTICE OF VIOLATION

Cleveland Electric Illuminating Company

Docket No. 50-440

As a result of the inspection conducted on July 1 through September 10, 1984, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion XI, as implemented through the applicant's Corporate Nuclear Quality Assurance Program, Section 1100, Revision 4, requires that testing to demonstrate that systems will perform satisfactorily in service shall be performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The Final Safety Analysis Report (FSAR), Section 1.8, requires that acceptance testing of the P52 instrument air system shall conform to Section C.5 of Regulatory Guide 1.80, Revision 0, "Preoperational Testing of Instrument Air Systems". Regulatory Guide 1.80, Revision 0, Section C.5, requires that the ability of the instrument air system to meet system cleanliness requirements with respect to oil and particulate matter contained in the product air shall be verified by test through analyzing the air using either continuous flow or discrete sampling techniques. The FSAR, Section 9.3.1, as modified by the response to FSAR question Q410.17, requires that the P52 instrument air system shall meet the system cleanliness requirements of ANSI MC11.1-1975 (ISA S7.3), "Quality Standard for Instrument Air". ANSI MC11.1-1975, Sections 4.2 and 4.3, specify that the maximum particulate size in the air stream shall be 3 micrometers and the maximum oil/hydrocarbon content in the air stream not exceed 1 part per million.

Contrary to the above, the Unit 1 P52 instrument air system was tested and turned over to the operations department without demonstrating that the system would perform satisfactorily in service. The FSAR instrument air cleanliness specifications had not been verified by test through quantitative analysis of the air stream. The cleanliness specifications had not been incorporated into the written system test specifications, system test procedure or system flush procedure.

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

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PDR ADOCK 05000440
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.

OCT 10 1984

Dated

R F Warnick
R. F. Warnick, Chief
Reactor Projects Branch 1

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