

Appendix

NOTICE OF VIOLATION

T. Todd Edison Company

Docket No. 50-346

As a result of the inspection conducted on November 19, 1984 through January 10, 1985, and in accordance with the General Policy and Procedures for Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V requires that "activities affecting quality shall be prescribed by documented instructions, procedures or drawings appropriate to the circumstances...."

Contrary to the above on December 9, 1984, the inspector identified that drawing M-029B was not appropriate in that it did not include a source valve for channel 3 of the Reactor Protection and Safety Features Actuation Systems. The valve was not tagged or included in the system procedures.

This is a Severity Level IV violation (Supplement 1).

2. 10 CFR Part 50, Appendix J, paragraph III.C.3 requires that "The combined leakage rate for all penetrations and valves subject to Type B and C tests shall be less than 0.60 La." Davis Besse Technical Specification 3.6.1.2 paragraph b requires the combined leakage rate for all penetrations and valves subject to Type B and C tests, when pressurized to Pa, be less than 0.60 La.

Contrary to the above, the licensee did not quantify the leakage through various isolation valves and adequately calculate the combined leakage rate for penetrations and isolation valves during the 1980 outage. Failure to adequately calculate the combined leakage rate for penetrations and valves resulted in the licensee not knowing they had exceeded the 0.60 La limit.

This is a Severity Level V violation (Supplement 1).

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). If we do not hear from you in this regard within the specified periods noted above, a copy of this letter and the enclosures will be placed in the Public Document Room.

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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.

2/8/85



R. L. Spessard, Director  
Division of Reactor Safety