Appendix

NOTICE OF VIOLATION

Consumers Power Company Docket No. 50-255

As a result of the inspection conducted on February 25 through March 8, 1985, 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 XVI, as implemented by Consumers Power Company (CPCo) "Quality Assurance Program for Operational Nuclear Power Plants" (CPC-2A), requires that measures shall be established to ensure that conditions adverse to quality are promptly identified and corrected. Further, CPC-2A, Section 16.2.2 requires that, for conditions noted adverse to quality, appropriate remedial action is taken and corrective action is implemented in a timely manner.

   Contrary to the above:

   a. Open Item 255/78-25-01 identified a failure to perform preventive maintenance (PM) on magnetic and thermal overload trip devices in the 480 volt switchgear and motor control centers. Interviews with plant personnel and examination of the Periodic Activity Control System disclosed that PM had been performed on only a portion of the 460/480 volt safety-related switchgear and that not all safety-related load centers had been incorporated into the PM program.

   b. Thirteen plant administrative procedures were noted as overdue for biennial review. This situation existed even though: (1) a QA surveillance report in October 1984 had found one procedure overdue and noted 73 other procedures that were due by December 1984; (2) QA department followup in January 1985 found only 38 of the overdue procedures had been reviewed; (3) an Audit Finding Report of January 31, 1985 found eight procedures still lacking review.

   This is a Severity Level IV violation (Supplement 1) (255/85003-01(DRP))

2. 10 CFR 50, Appendix B, Criterion XVI, as implemented by CPC-2A requires that measures shall be established to ensure that conditions adverse to quality are promptly identified and corrected. Further, ANSI N18.7 (1976), "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants", as endorsed by CPC-2A requires that in the case of significant conditions adverse to safety, the measures shall assure that the cause of the condition is determined and corrective action documented.

   Contrary to the above, a review of Quality Control Activity Inspection Reports AI-84-05 and AI-84-79 and Quality Assurance Audit Report A-QA-84-6 identified four instances of significant conditions adverse to safety that

were labeled "Observations" instead of "Findings" thus not requiring response or followup to ensure corrective actions. Each instance involved one or more of the following: (1) lack of post maintenance testing, (2) poor housekeeping, and (3) failure to control equipment.

This is a Severity Level IV violation (Supplement 1) (255/85003-21(DRP)).

3. 10 CFR 50, Appendix B, Criterion V, as implemented by CPC-2A, which includes a commitment to ANSI N18.7 (1976), requires that activities affecting quality be prescribed by documented instructions and procedures which include appropriate qualitative and quantitative acceptance criteria and be accomplished in accordance with those instructions and procedures.

Contrary to the above, the following examples of failure to follow procedures were identified:

a. The licensee failed to accomplish the requirements of Administrative Procedure 5.03 "Preventive Maintenance Program" in that:

(1) No machinery history file was being maintained by any of the maintenance departments and, therefore, no trending was being performed.

(2) Preventive maintenance was not performed within the prescribed frequency.

(3) The reasons for failure to perform preventive maintenance on schedule were not being documented and provided to the Maintenance Superintendent.

b. The licensee failed to accomplish the requirements of Administrative Procedure 4.03 "Equipment Control" in that:

(1) Monthly review of the Jumper, Link and Bypass Control Log was not being conducted.

(2) Action was not initiated in a timely manner to remove a bypass (e.g., lifted lead) that was no longer needed due to its having became a permanent modification.

(3) Formal management action was not taken in a timely manner to permanently modify a system and update the system configuration for a bypass (e.g., lifted lead) that was installed longer than a fuel cycle.

This is a Severity Level IV violation (Supplement 1) (255/85003-03(DRP)).

4. 10 CFR 50, Appendix B, Criterion XVI, as implemented by CPC-2A, which includes a commitment to ANSI N18.7 (1976), states, in part, that measures shall be taken to assure conditions adverse to quality are determined and corrective action taken to preclude repetition. Further, Section 5.2.7.1 of ANSI N18.7 (1976) states, in part, the causes of malfunctions shall be promptly determined, evaluated and recorded, and any experience which malfunctioning equipment and similar components shall be reviewed and evaluated.

   Contrary to the above, the inspection identified that the root cause for equipment malfunctions was not being documented.

   This is a Severity Level IV violation (Supplement I) (255/85003-05(DRP)).

5. 10 CFR 50, Appendix B, Criterion II, as implemented by CPC-2A, requires that activities affecting quality shall be accomplished under suitably controlled conditions, which include suitable environmental conditions such as cleanliness. Further, Section 5.2.10 of ANSI N18.7(1976), as endorsed by CPC-2A, requires that housekeeping practices shall be utilized; these practices encompass fire protection and prevention, including disposal of combustible material and debris, and measures to ensure that the quality of items is not degraded.

   Contrary to the above, the following examples of poor housekeeping practices were observed:

   a. During a tour of Rooms 328 and 332, miscellaneous items and combustible debris were found in Class 1E cable trays and on the floors. Also, ceiling/building joint leaks allowed water to leak onto Class 1E cables and accumulate on floors and hatchways. There were visible indications that these conditions had existed for some time, both in these rooms and others where protective tarps were found to protect pumps and other equipment from leaking water.

   b. During a tour of the Auxiliary Building combustible material, contaminated tools and an aerosol can were found stored in two safety-related electrical cabinets.

   Considering the time the above conditions had been allowed to exist and the potential significance of causing Class 1E safety-related cabling to exist in a water environment, these examples are, collectively, considered a Severity Level IV violation (Supplement 1) (255/85003-11(DRP)).

6. Technical Specifications, Section 6.8, states in part, "Written procedures are required to be implemented to cover test activities of safety-related equipment."

Contrary to the above, Maintenance Order 85-ESS-0042, Calibration of Level Transmitter LT-0437A, required by Technical Specification, Section 3.19.1.*a*, was accomplished without a procedure.

This is a Severity Level IV violation (Supplement 1) (255/85003-07(DRP))

7. 10 CFR 50, Appendix B, Criterion XII, as implemented by CPC-2A, requires that measures be established to assure that measuring and test devices used in activities affecting the quality of safety-related items are properly controlled, calibrated, and adjusted at specific periods to maintain accuracy within specified limits.

   Contrary to the above, a significant number of portable measuring and testing devices were improperly controlled. Further, two micrometers with calibrations overdue in excess of two months were checked out for use and were lost.

   This is a Severity Level V violation (Supplement 1) (255/85003-02(DRP))

8. 10 CFR 50, Appendix B, Criterion V, as implemented by CPC-2A, requires that procedures shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Further, ANSI N18.7(1976), Section 5.2.7, as implemented by CPC-2A, requires that maintenance or modification of equipment shall be prepared and performed in accordance with written procedures, documented instructions, or drawings.

   Contrary to the above, the instructions provided in Maintenance Order Nos. 85-ESS-0027, 85-ESS-0011, and 85-CVC-0016, were not of sufficient detail for the type of activities being performed.

   This is a Severity Level V violation (Supplement 1) (255/85003-04(DRP))

9. 10 CFR 50, Appendix B, Criterion VII, as implemented by CPC-2A, requires that measures shall be established for the identification and control of materials and parts to be used in safety-related equipment to prevent the use of incorrect or defective material, parts, and components. Further, ANSI N45.2.13(1976), "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants", as endorsed by CPC-2A requires that procurement documents shall identify any technical requirements of the purchased material, including shelf life.

   Contrary to the above, during a tour of storage facilities, the inspectors identified two rubber products stored with no shelf life identified as required. These items had been purchased for initial plant construction and were being controlled under Dummy Purchase Order No. 189. Due to procedural inadequacies that existed at the time the dummy purchase order was generated, shelf life was not identified as a requirement.

   This is a Severity Level V violation (Supplement 1) (255/85003-15(DRP))

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.

APR 17 1985

Dated

Edward D. Tomlinson /for

C. E. Norelius, Director
Division of Reactor Projects