

## NOTICE OF VIOLATION

Centerior Service Company  
Perry Nuclear Power Plant

Docket No. 50-440  
License No. NPF-58

During an NRC inspection conducted on July 27 through September 14, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34380, June 30, 1995), the violations are listed below:

1. 10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions and procedures and be accomplished in accordance with these instructions and procedures.

- a. Perry Administrative Procedure 1201 "Control of Measuring and Test Equipment," Section 6.3.1, step 3.c required that M&TE be stored in a secure area or documented as issued to individuals for use. The storage and use of M&TE available for use with safety-related equipment was an activity affecting quality.

Contrary to the above, on September 9, 1996, the inspectors observed a calibrated FLUKE multimeter (M&TE available for use with safety-related equipment) unattended outside of a secure storage area and the multimeter was not documented as having been issued (50-440/96006-02a(DRP)).

- b. Field Clarification Request (FCR) 13745 defined storage area boundaries for scaffolding components. Scaffold materials were required to be stored within the storage area boundaries. Storage of scaffold within a defined storage area to prevent it from becoming a hazard to safety-related equipment was an activity affecting quality.

Contrary to the above, on September 5, 1996, the inspectors observed one scaffold component stored outside of the designated scaffold storage area on the 599 foot elevation of the intermediate building. Again on September 10, 1996, the inspectors observed scaffold components (4 pieces) at the same unauthorized location, which was within 1 meter of a safety-related valve (50-440/96006-02b(DRP)).

This is a Severity Level IV violation (Supplement 1)

2. Technical Specification (TS) Surveillance Requirement (SR) 3.3.6.1.4 required that a channel calibration be performed on the primary containment and drywell isolation instrumentation every 18 months. TS SR 3.3.6.1.5 required that a logic system functional test be performed on the primary containment and drywell isolation instrumentation every 18 months. TS Table 3.3.6.1-1 identified the functions that required testing for SR 3.3.6.1.4 and SR 3.3.6.1.5. The following relay contacts were required to be tested to verify functions listed in TS Table 3.3.6.1-1:

1E31-N702A-K5 contacts 9/5, Function 1.3.f  
1E31-N702B-K5 contacts 9/5, Function 1.3.f  
1E31-N702A-K6 contacts 9/5, Function 1.3.a  
1E31-N702B-K6 contacts 9/5, Function 1.3.a  
1E31-N702A-K7 contacts 9/5, Function 1.2.b  
1E31-N702B-K7 contacts 9/5, Function 1.2.b

The new TS SR became effective on July 14, 1996. The relay contacts listed above, part of the leak detection system, had not been tested following a modification to the system completed in February and March of 1996, and had not been tested in accordance with the old TS SR prior to the effective date of the new TS SR. Therefore, once the new TS SR became effective, they were required to be tested immediately.

Contrary to the above, from July 14, 1996, until August 21, 1996, the above listed contacts were not tested as required by TS SR 3.3.6.1.4 and SR 3.3.6.1.5 (50-440/96006-08(DRP)).

This is a Severity Level IV violation (Supplement 1)

Pursuant to the provisions of 10 CFR Part 2.201, Centerior Service Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois  
this 9th day of December 1996