Appendix

NOTICE OF VIOLATION

The Cleveland Electric Illuminating Company (CEI) — Docket No. 50-440

As a result of the inspection conducted on August 3 through September 13, 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 V, as implemented by CEI's Corporate Nuclear Quality Assurance Program (CNQAP), Section 0500, Revision 6, states that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances."

   Contrary to the above, preoperational test procedure TP 1P57-P001, "Safety-Related Instrument Air," is not appropriate in that this procedure does not adequately control the sequence of testing. Although Section 6.0, Note 2, indicates that any independent section can be done in any order, there are two identified instances where performing the sections out of order will result in failed or inadequate testing. Contrary to test requirements, failing to perform step 6.1.1 prior to Section 6.5 will prevent depressurization of the compressor discharge piping. In addition, failing to perform steps 6.3.6 and 6.3.8 prior to Section 6.5 will result in a nonconservative partial test instead of a system wide pressure drop test.

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

2. 10 CFR 50, Appendix B, Criterion V, as implemented by CEI's CNQAP, Section 0500, Revision 6, states that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings."

   Contrary to the above, testing conducted in conjunction with preoperational test procedures TP 1R76-P001, "ECCS Initiation/ Loss of Offsite Power," TP 1C71-P001, "Reactor Protection System," and TP 1M51-P001, "Combustible Gas Control System," was not accomplished in accordance with applicable procedure requirements.

   In procedure TP 1R76-P001, step 6.4.9.a(4) consists of racking-in breaker EH1210 and verifying that its associated system is in readiness for auto-start and operation. A failure to properly perform this procedure step by not turning on the charging spring

motor resulted in a failure of Residual Heat Removal Pump C to start during the simultaneous Loss of Offsite Power and Loss of Coolant Accident test. In addition, Reperformance #1 of procedure TP 1M51-P001 was not conducted in accordance with administrative requirements of Test Program Instruction (TPI)-28, "Conduct of Preoperational, Special, and Acceptance Tests." The System Test Engineer (STE) did not specify to the Lead Test Engineer (LTE) the particular steps to be reperformed and did not have the LTE sign the chronological log entry depicting these steps to show his approval prior to the reperformance. Furthermore, in procedure TP 1C71-P001, prerequisite step 5.2 was improperly verified and signed off as completed. This step indicated installation of the Main Steam Isolation Valve (MSIV) open limit switches was complete, even though the limit switch for MSIV 1B21-F022B was disassembled and incapable of supporting the test. Finally, a change was made to Attachment 5 of procedure TP 1C71-P001 to modify the method of simulating an open MSIV without processing a Test Change Form in accordance with the requirements of TPI-28.

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

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 violation: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further violation; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated OCT 3 1985

C J Paperiello

C. J. Paperiello, Director
Division of Reactor Safety