

## NOTICE OF VIOLATION

The Cleveland Electric  
Illuminating Company

Docket No. 50-440

As a result of the inspection conducted on January 11-15, January 25-29 and February 9, 1988, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1987), the following violation was identified:

10 CFR 50, Appendix B, Criterion V, as implemented by PNPP, Operational Quality Assurance Plan, Section 5.0, requires that activities affecting quality be prescribed by instructions or procedures and accomplished in accordance with those instructions or procedures. Section 5.0 further requires procedures to include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above:

- a. Procedure PAP 0906, "Control of Maintenance Section Preventive Maintenance," Revision 1, did not include criteria to make technical evaluations for rescheduling preventive maintenance activities. As a result, repetitive tasks (preventive maintenance) already several months past due, were rescheduled for nine motor-operated valves in the residual heat removal and liquid radwaste systems without evaluations of the effects the delays could have on plant safety, operability, or reliability. (440/87025-03E)
- b. The licensee failed to fully accomplish Preventive Maintenance Instruction, PMI-0030, "Maintenance of Limitorque Valve Operators," Revision 1, as follows:
  - ° The inspector observed that valve stems for several residual heat removal system and liquid radwaste system valves were lubricated with Neolube although PMI-0030 specified Nebula EPO.
  - ° There was no objective evidence that two residual heat removal system valves had been electrically and manually cycled as specified in the post maintenance requirements of PMI-0030. (440/87025-03C)
- c. The licensee failed to properly implement Administrative Procedure PAP-0905, "Work Order Process," Revision 7, which outlined the requirements for processing work orders (WO) from initiation to closure as follows:
  - ° WO 87-9677 - Summary description did not accurately reflect the activity performed;
  - ° WO 87-5727, 87-10390, 88-0080 - Incomplete or incorrect corrective action indicated on WO Closing and Summary Sheet;

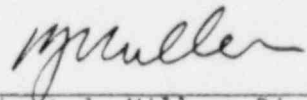
- ° WO 87-6175, 87-7385, 87-8746, 87-9361, 87-9498, 87-9677, 87-10213 - Incorrect or inadequate immediate failure cause identified on the WO Closing and Summary Sheet;
  - ° WO 87-2249, 87-8746, 87-9361, 87-9677, 87-10390 - Incorrect or incomplete WO closing codes;
  - ° WO 87-4825, 87-8298, 87-8597, 87-9677 - Incorrect or incomplete Master Part List (MPL) numbers; and
  - ° WO 87-9361 - Inadequate closing summary on the WO Closing and Summary Sheet. (440/87025-03A)
- d. The licensee failed to fully accomplish Nuclear Quality Assurance Department procedure, NQAD 1840, Revision 2, "Audit Performance," Section 6.2, which required that deficiencies noted during audits be documented on Action Requests. Deficiencies identified during Audit 87-12, "Effectiveness of Corrective Action" were listed as observations; therefore, the established corrective system was bypassed. One observation pertained to continued untimely and ineffective corrective action, which prior to Audit 87-12, had also been identified as a concern by the licensee's QA organization and the NRC. (440/87025-03D).

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

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 violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

3/31/88

  
Hubert J. Miller, Director  
Division of Reactor Safety