

NOTICE OF VIOLATION

The Cleveland Electric Illuminating
Company

License No. NPF-58

As a result of the inspection conducted July 1 through August 23, 1988, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1987), the following violations were identified:

1. Technical Specification 6.8.1 requires implementation of applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes administrative procedures which address procedure adherence.

Plant Administrative Procedure (PAP)-0201, "Conduct of Operations," Revision 3, Section 6.2.1 stated that plant equipment shall be operated in accordance with written, approved instructions.

Contrary to the above, on March 22 and 23, 1988, licensee personnel performed the venting and filling of the residual heat removal system without written procedural guidance, even though a plant rounds instruction existed to direct the filling and venting operation.

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

2. Technical Specification 6.2.2.e requires that administrative procedures be developed and implemented to limit the working hours of unit staff who perform safety related functions in accordance with the NRC Policy Statement on working hours (Generic Letter No. 89-12).

Plant Administrative Procedure (PAP)-0110, "Shift Staffing and Overtime," Revision 2, which implemented the above requirements, stated that when circumstances require deviation from specified guidelines, an Overtime Deviation Request, PAP-0110-1, shall be completed.

Contrary to the above, on seven occasions between January and March 1988, the overtime guidelines were exceeded without an approved Overtime Deviation Request having been completed. Additionally, on one occasion, a blanket authorization to exceed the overtime guidelines was approved.

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

3. Technical Specification 6.8.1 requires implementation of applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 which includes administrative procedures which address procedure adherence.

Plant Administrative Procedure (PAP)-0201, "Conduct of Operations," Revision 3, Section f.2.2.d. required that surveillance instructions (SVIs) be performed in a step-by-step manner throughout the instruction, or step-by-step within a section if only a partial SVI is required.

Contrary to the above, on August 12, 1988, during the performance of SVI-C41-T2001, "Standby Liquid Control Pump and Valve Operability Test," Revision 4, Valve 1C41-F002B was not reopened and locked as required by Step 5.1.2.10. As a result, both trains of the standby liquid control system were simultaneously rendered inoperable during the performance of subsequent procedural steps.

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

9/14/88

for *Robert de Jayette*
Richard C. Krop, Chief
Reactor Projects Branch 3