

NOTICE OF VIOLATION

The Cleveland Electric Illuminating
Company

Docket No. 50-440

As a result of the inspection conducted on December 30, 1985 through March 3, 1986, 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 PNPP Quality Assurance Plan, Section 5, require that activities affecting quality shall be prescribed by and accomplished in accordance with instructions and procedures.

Contrary to the above, the following violations of these requirements were observed during the inspection period:

- a. CEI System Operating Instructions SOI-E21, Revision 3, "Low Pressure Core Spray System (Unit 1);" SOI-G33, Revision 2, "Reactor Water Cleanup System (Unit 1);" and SOI-P47, Revision 2, "Control Complex Chilled Water System," which direct activities that affect quality, were found to contain technical errors and omissions which rendered the instructions inadequate. Examples were identified where components were improperly identified, activities were directed to be performed by the wrong section of the instruction, operators were directed to shutdown equipment that should have been started up, system restoration steps were omitted, required block valves were not opened when establishing system flow, and verification checklist did not specify the proper component configuration.
- b. Work Order No. 86-2829 for filling and venting the suppression pool level instruments was not prepared, controlled, or accomplished in accordance with instructions and administrative procedures in that uncontrolled non-asbuilt drawings were used in the performance of safety-related work, work was performed out of the required sequence, incorrect instructions (identified during the performance of the work order) were not properly corrected prior to continuing work, and the work order did not, as required, include the purpose of the work order in the planners remark section.
- c. Independent restoration verifications associated with Work Order No. 86-2829 were not accomplished in accordance with administrative procedure in that physical valve position verification was not performed.

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

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2. 10 CFR 50, Appendix B, Criterion II, as fulfilled by the applicant's Quality Assurance Program described in Final Safety Analysis Report, Section 17.2.2.2.c, requires that environmental conditions affecting quality shall be suitably controlled. These controls, implemented through Plant Administrative Procedure (PAP)-0204, "Housekeeping/Cleanliness Control Program", shall meet the requirements of Regulatory Guide 1.39, Revision 2, and ANSI N45.2.3-1973 as committed by the applicant in Final Safety Analysis Report, Table 1.8-2.

Contrary to the above, the following violations of these requirements were observed during the inspection period:

- a. PAP-0204 did not designate proper housekeeping zone classification for the fuel handling area, the fuel storage area, and for the suppression pool, and responsibility for establishing the proper housekeeping zones was not assigned as required in ANSI N45.2.3-1973, Section 3.2.
- b. Tools, supplies, and equipment were not being controlled in the facility by tagging and/or removal in accordance with PAP-0204, Section 6.5, and ANSI N45.2.3-1973, Section 3.4.

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.

MAR 24 1986

Dated _____

R F Warnick
R. F. Warnick, Chief
Reactor Projects
Branch 1