

## NOTICE OF VIOLATION

Toledo Edison Company  
Davis-Besse Nuclear Power Station

Docket No. 50-346  
License No. NPF-3

As a result of the inspection conducted on August 4 through October 20, 1988, and in accordance with the "General Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, as implemented by the Toledo Edison Nuclear Quality Assurance Manual, Quality Requirement 5.4.1.1 requires that activities that affect quality shall be prescribed by clear and complete documented procedures and instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these documents.

- a. Section 6.4.6.b of the Acceptance Test Program procedure states in part, "Individual test steps . . . may be repeated during the conduct of the test . . . . Repeated steps shall be documented by resigning the individual affected steps."

Contrary to the above, on September 6, 7, and 8, 1988, the licensee failed to document or resign the three retests consisting of Steps 6.4.1 through 6.4.17 of Procedure DB-PF-10050.

- b. Section 6.4.1.d of the Acceptance Test Program procedure states in part, "Procedure steps and sections shall be performed in numerical sequence unless otherwise noted in the test procedure."

Contrary to the above, on August 10, 1988, steps in Procedure DB-PF-10050 were performed out of sequence without specific authorization in the procedure to do so.

- c. Davis-Besse periodic Test Procedure DB-SP-04153, Paragraph 5.1, required test personnel to perform the Auxiliary Feedwater Pump Turbine (AFPT) 2 valve lineup in accordance with Attachment 1.

Contrary to the above, on August 9, 1988, AFPT 1-2 casing drain throttle Valve MS 744A was found in the closed position, although Attachment 1: AFPT 2 Valve Lineup Checklist had been initiated and required the valve to be open.

- d. Davis-Besse Test Procedure DB-PF-10050, Not 6.4, required that during performance of this section, Attachment 9 was to be utilized for of the initial valve lineup.

Contrary to the above, Attachment 9, Sketch for Section 6.4 required that motor operator Valve AF3872 be in the closed position, but was found in the open position well into the reperformance of Section 6.4.

- e. Davis-Besse Test Procedure DB-PF-03009, Containment Integrated Leak Rate Test (CILRT), Section 3.1, Attachment 2, System Alignment, required valves SA508 and MS883 to be in the closed position for the CILRT.

Contrary to the above, Valves SA508 and MS883 were found in the open position for the CILRT, although, the licensee had verified and independently verified the position of the valves.

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

- 2. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," as implemented by Toledo Edison Nuclear Quality Assurance Manual, Section 14.1 requires for significant conditions adverse to quality that corrective actions to preclude repetition be taken.

Contrary to the above, the licensee's corrective actions in response to violations 1c, d and e above did not preclude repetition in that valve RC 239A was required to be opened but was in the closed position after a complete re-verification of all valve positioning by the licensee.

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

- 3. 10 CFR 50, Appendix J, Paragraph III.A.1 requires that "During the period between initiation of the containment inspection and the performance of the Type A test, no repairs or adjustments shall be made so that the containment can be tested in as close to the "as is" as practical.

10 CFR 50, Appendix J, Paragraph III.A.3.(a) requires that all Type A tests be conducted in accordance with the provisions of ANSI N45.4-1972. ANSI N45.4-1972, Paragraph 4.2 requires "For retesting, an initial record proof test shall be conducted at time periods and pressures established by the responsible organization, before any preparatory repairs are made. This will disclose the normal state of the containment structure and a record of the results shall be retained."

Contrary to the above, the licensee performed maintenance on the Containment Vacuum Breaker Isolation valve CU5075 prior to the Type A test and prior to performing an as-found local leak rate test.


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

With respect to Item 3, the inspection showed that actions had been taken to correct the identified violations and to prevent recurrence. Consequently, no reply to the violation is required and we have no questions regarding this matter. With respect to Items 1 and 2 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) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will 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.

NOV 21 1988

Dated \_\_\_\_\_

  
Geoffrey C. Wright, Chief  
Operations Branch