

Appendix

NOTICE OF VIOLATION

The Cleveland Electric Illuminating
Company (CEI)

Docket No. 50-440

As a result of the inspection conducted on March 23 through May 10, 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 and shall be accomplished in accordance with these instructions, procedures, or drawings".

Contrary to the above, sufficient administrative controls were not prescribed in appropriate procedures to adequately govern conduct of integrated run-in testing activities performed under control of Temporary Operating Instructions prior to preoperational test release for performance (440/85017-01(DRS)).

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, requires that activities affecting quality shall be accomplished in accordance with procedures.

Contrary to above, the Low Pressure Core Spray System, a safety related system required for safe shutdown was operated without utilizing (or in accordance with) procedures (440/85017-07(DRS)).

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

3. 10 CFR 50, Appendix B, Criterion V and Regulatory Guide 1.68, Revision 2, as implemented by CEI's CNQAP, Section 0500, Revision 6, requires that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and that test procedures shall include appropriate checklists and signature blocks to control test performance and the sequence of testing.

Contrary to the above, Perry Nuclear Power Plant Test Program Instruction, TPI-7 "Preoperational, Acceptance and Special Test Procedure Preparation, Review and Approval" was not appropriate to control test performance and the sequence of testing for test procedures as described in Paragraph 5a (440/85017-08(DRS)).

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

4. 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." Test Program Instruction-27 Section 4.2 requires that pretest checklists be completed as part of the release for test package.

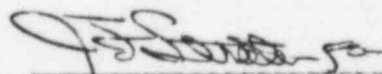
Contrary to the above, actions pursuant to these checklist verifications were inadequately accomplished in conjunction with test procedures TP 1E12-P001, "Residual Heat Removal (RHR) System" and TP 1R43-P001, "Division 1 Standby Diesel Generator." Checklist verifications conducted to ensure that design changes are incorporated into the test procedure and that the test procedure is written to the latest approved revision of design documentation and to the as-built condition of the plant did not identify the need to incorporate Engineering Change Notice NJ35313 into the RHR test procedure. This design change had already been depicted on plant drawings and in the as-built plant condition. In addition, checklist verifications conducted to ensure that lifted leads and jumpers had been reviewed for impact on standby diesel generator testing did not identify a jumper installed which bypassed the diesel generator out-of-service alarm (440/85017-05(DRS)).

This is Severity Level V 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 item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

JUN 12 1985

Dated



R. L. Spessard, Director,
Division of Reactor Safety