

APPENDIX A

NOTICE OF VIOLATION

Connecticut Yankee Atomic Power Company
Hartford, Connecticut 06101

Docket No. 50-213
License No. DPR-61

As a result of the inspection conducted on October 16 - December 2, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, Technical Specification (TS) 6.8 and the Northeast Utilities Quality Assurance Program require activities affecting quality to be prescribed and accomplished in accordance with documented procedures. The following licensee procedures prescribe quality affecting activities:
 - a. Administrative Control Procedure 1.2-5.1, Trouble Reporting System and Automated Work Orders (AWOs), requires work activities to be controlled and documented including: (1) the correct quality classification of the work scope; (2) the implementation of a supplemental work order when the work scope increases; (3) the correct processing of Material Issue Lists (MILs); and (4) when applicable, the specification of the plant design change request (PDCR) and pre-operational test procedure in the task description and retest sections of the AWO.
 - b. Administrative Control Procedure 1.2-15.1, Nonconformance Control requires nonconformance reports (NCRs) for operating equipment to be reviewed and dispositioned in a timely manner such that the applicable TS Limiting Condition for Operation (LCO) can be met.
 - c. Administrative Control Procedure 1.2-8.2, Material Issue, requires Material Issue Lists (MILs) to be correctly classified and requires the storekeeper to assure that the issued material conforms to the MIL requirements.
 - d. Administrative Control Procedure 1.2-6.4, Temporary Procedure Change (TPC), requires TPCs to be reviewed by the onsite review committee (PORC) and approved by the Station Superintendent within 14 days of the implementation of the change.
 - e. Administrative Control Procedure 1.2-3.1, Preparation, Review, and Disposition of Plant Design Change Requests (PDCRs), requires surveillance tests necessitated by plant design changes to be included in plant procedures within one month of the completion of the design change.

Contrary to the above:

- a. On October 12, 1985, AWO 85-06480 was not controlled and documented in accordance with procedure 1.2-5.1 in that: (1) supplemental work orders

were not implemented when the work scope changed from the #3 Steam Generator (SG) wide range level indicators to the #3 SG wide range and narrow range level transmitters; and (2) the MIL for this work activity was not correctly processed because the Category 1 classification of the required replacement component was not specified.

- b. On October 25, 1984, AWO 84-08964 was not controlled and documented in accordance with procedure 1.2-5.1 because the applicable PDCR 622 (Core Cooling Using Power-Operated Relief Valves) was not specified in the task description section of the AWO, and because the applicable preoperational test (SPL 10.7-219) was not specified in the retest section of the AWO.
- c. On October 15, 1985, NCR 85-194 for installation of a non-Category 1 level transmitter in the Category 1 steam generator level indication system was not reviewed and dispositioned in a timely manner, in that the NCR was not dispositioned until October 23, 1985. Had that review determined that the replacement transmitter was not acceptable, the TS 3.9 Limiting Condition for Operation (LCO) would have been exceeded for 9 days.
- d. On October 4, 1985, the MIL for AWO 85-06299 was not correctly classified, and the storekeeper did not assure that the issued material conformed to the MIL requirements in that the alarm unit listed on the MIL was not classified as Category 1 and a Category 1 unit was issued. Although this was a conservative action, this is nonetheless an example of non-adherence to procedures.
- e. Three safety-related TPCs were not reviewed by PORC or approved by the Station Superintendent within 14 days in that TPCs 85-123 and 85-124, implemented on September 16, 1985, and TPC 84-185, implemented on October 19, 1984, were not reviewed and approved until October 17 and 25, 1985, respectively.
- f. As of December 2, 1985, the surveillance tests necessitated by PDCR 622, Core Cooling Using Power-Operated Relief Valves (PORVs), were not included in plant procedures within one month of completion of that design change on October 29, 1984, in that no procedure existed for the PORV air supply check valve seat leak test or the PORV emergency air and control power test.

These violations have been categorized in the aggregate at Severity Level IV (Supplement I).

- 2. 10 CFR 50, Appendix B, Criterion XVI requires measures to assure that nonconformances are promptly identified and corrected and that action is taken to preclude repetition. In August 1985, the licensee identified 15 violations of the requirement to review procedures every 2 years. The licensee's planned corrective actions, accepted by the NRC in Inspection Report 50-213/85-13, were to complete the overdue reviews by September 17, 1985, and to assure that future procedure reviews would be completed within the specified frequency.

Contrary to the above, the licensee's corrective actions did not assure that the procedure review nonconformances identified in August 1985 were promptly corrected, in that 15 overdue procedure reviews remained incomplete as of October 16, 1985. Neither did the corrective actions preclude repetition of this nonconformance, because seven other procedures became overdue for review during the period September 17 - October 16, 1985.

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

Pursuant to the provisions of 10 CFR 2.201, Connecticut Yankee Atomic Power Company is hereby required to submit to this office within thirty days of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.