

Appendix

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-255

As a result of the inspection conducted on July 9 through August 12, 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 50.59 states in part: "The licensee shall maintain records of changes in the facility..." which "...shall include a written safety evaluation which provides the basis for the determination that the change... does not involve an unreviewed safety question."

Contrary to the above, the licensee removed roof hatches for the East Safeguards Pump Room on July 17, 1985, an action which partially defeated the ventilation isolation capability of the room as described in the FSAR Section 7.4.5.2, without performing a safety evaluation.

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

2. 10 CFR 50, Appendix B Criterion III states: "Measures shall be established to assure that applicable regulatory requirements and the design basis ... for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled. Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components." Also, "The design control measures shall provide for verifying or checking the adequacy of design..."

Consumers Power Company Quality Assurance Topical Report CPC-2A implements 10 CFR 50 Appendix B. Section 3.1 of the Topical Report further states: "...The [design] controls apply to preparation and review of design documents, including the correct translation of applicable regulatory requirements and design bases into design, procurement and design bases into design, procurement and procedural documents." Appendix A, Part 1 of the Topical Report entitled "Regulatory Guide and ANSI Standard Commitments" commit the plant to ANSI N45.2.11-1974 and N18.7-1976.

- a. ANSI N45.2.11-1974 requires consideration of redundancy, diversity, separation requirements and failure effects requirements of structures, systems and components including a definition of those events and accidents which they must be designed to withstand (Section 3.2). Section 6.1 of this standard also requires verification of the adequacy of the design.

- b. ANSI N18.7-1976 requires that purchased materials and components associated with safety-related structures or systems are purchased to meet the required specifications and codes. IEEE 323-1974 includes electrical equipment and systems essential for containment isolation in the definition of Class 1E equipment.

Contrary to the above:

- a. Design considerations for redundancy, diversity, and separation were incorrectly applied for Facility Change (FC) 452-2 which installed a single pressure switch and relay in series with both trains of the containment isolation signal to the component cooling water (CCW) isolation valves. The evaluator of the change incorrectly assumed that redundant pressure switches were included in the design. Also, this change did not consider the impact of the operation of the non-seismic portion of the CCW system inside containment during an accident or event.
- b. Purchase documents associated with FC-452-2 did not specify the appropriate requirements for Class 1E system components.

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

- 3. 10 CFR 50.59(a)(1) requires prior Commission approval of a change involving an unreviewed safety question. Paragraph (a)(2) in part defines an unreviewed safety question as a change where the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased.

Contrary to the above, the Safety Evaluation for FC-452-2 did not conclude that an unreviewed safety question existed whereas the probability of the occurrence of a malfunction of the initiation circuit for containment isolation of the CCW system was increased by adding another relay in series with the Safety Injection signal. (The Safety Evaluation that was performed also inaccurately described redundant pressure switches.) The NRC had been notified of the licensee's intent to make a different modification to the isolation logic.

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

- 4. Technical Specification 6.8.1.f requires the implementation of procedures covering the Site Fire Protection Program. Fire Protection Implementing Procedure No. 7, Section 9.2 sets forth requirements for training of fire watches and their duties and responsibilities which include being present during hot work with a suitable fire extinguisher.

Contrary to the above on July 16, 1985, a welder was observed grinding, an activity for which he had obtained a "Hot Work Permit", without posting a fire watch or having a fire extinguisher present.

This is a Severity Level V 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 the 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 noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

9-13-85
Date

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