

APPENDIX A

NOTICE OF VIOLATION

Power Authority of the State of New York
Indian Point 3 Nuclear Power Plant

Docket No. 50-286
License No. DPR-64

As a result of the inspection conducted on April 24 through May 5, 1989 and in accordance with the "General Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion IX, requires that special processes, such as nondestructive testing, be controlled and accomplished using qualified procedures.

Technical Specifications for Welding, Post Weld Heat Treatment, and Nondestructive Examination, 16802-M-005, invokes ANSI B31.1, 1986. Paragraph 136.4.4(6) of that code states that for liquid penetrant examinations any relevant linear indications greater than 1/16" are unacceptable. Site liquid penetrant examinations procedure PT(SR) ANSI, Rev. 0, states the same acceptance criteria in paragraph 5.8.3.

Contrary to the above, an NRC re-examination by liquid penetrant during April 24 through May 5, 1989 disclosed that code inspected and accepted weld RSG 31 FW5, FW41 and RSG 34 FW8 contained unacceptable linear indications in the area of interest adjacent to the weld. These unacceptable linear indications were not recorded or dispositioned.

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

- B. 10 CFR 50, Appendix B Criterion IX, requires that special processes, such as nondestructive testing, be controlled and accomplished using qualified procedures.

Technical Specifications for Welding, Post Weld Heat Treatment, and Nondestructive Examination, 16802-M-005, invokes ANSI B31.1, 1986. Paragraph 136.4.3(B) of that code states that for magnetic particle examinations any relevant linear indications greater than 1/16" are unacceptable. Site magnetic particle examination procedures (MT) dry ANSI, Rev. 0, states the same acceptance criteria in paragraph 7.1.1(a).

Contrary to the above, an NRC re-examination by magnetic particle during April 24 through May 5, 1989 disclosed that code inspected and accepted weld RSG 31 main steam lug removal area adjacent to FW2 and girth weld FW5 C1 contained unacceptable linear indications. These unacceptable linear indications were not recorded or dispositioned.

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

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- C. 10 CFR 50.55(a)(c)4 requires that the reactor coolant pressure boundary to be constructed in accordance with the applicable Code Edition and addenda that were required by Commission regulations at the time of issuance of the construction permit.

In accordance with Revision 0 of the Indian Point 3 Final Safety Analysis Report, dated July 1982, the applicable code for nondestructive examinations of the reactor coolant piping welds made as part of the steam generator replacement is ASME B31.7, Class I which requires liquid penetrant examinations on both the outside and inside (if accessible) surfaces of all finished welds.

Contrary to the above, an NRC review revealed that, the licensee's implementation of site Technical Specification for Welding, Postweld Heat Treatment and Nondestructive Examination 16802-M-005 did not require inside surface examinations for the finished steam generator nozzle to piping welds. Subsequent to identification of this deficiency by the NRC, inside surface examinations performed by the licensee by liquid penetrant examination disclosed rejectable linear indications in these welds.

This is a Severity Level IV violation. (Supplement 1)

Pursuant to the provisions of 10 CFR 2.201, New York Power Authority is hereby required to submit to this office within thirty days of the date 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.