

APPENDIX A  
NOTICE OF VIOLATION

Pennsylvania Power and Light Company

Docket No. 50-387

Based on the results of an NRC inspection conducted during the period June 2 - June 27, 1980, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Facility License No. CPPR-101 as indicated below:

- A. 10 CFR 50, Appendix B, Criterion VI, states, in part: "These measures shall assure that documents, ...are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

The Susquehanna PSAR Section D.2.6, states, in part, "Measures will be established to control the issuance of documents, such as instructions, procedures, and drawings ... which prescribe activities affecting quality."

Plant Administrative Procedure AD-00-001, states, in Section 4.1, "The Superintendent of Plant is responsible for the final approval of all plant procedures."

Contrary to the above, Plant Maintenance Procedures MT-64-003 for removal of the recirculation pump seal and MT-GM-011 for repacking the recirculation pump discharge valve were in use, on June 25, 1980, at the location where the prescribed activity was being performed, the Unit 1 primary containment, and had not been approved by the Superintendent of Plant.

This is an infraction.

- B. 10 CFR 50, Appendix B, Criterion XV, states, in part, "Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

The Susquehanna PSAR Section D.2.15, states, in part, "Initial responsibility for the identification, documentation, segregation and disposition of nonconforming material, parts, or components will rest with the ... plant site as appropriate."

Startup Administrative Procedure AD 10.2, Startup Quality Program, states, in part, "During the Initial Test Program the performance of test activities on safety related or ASME Section III systems or components require quality verification. The quality verification of these activities is performed by Pennsylvania Power and Light Company personnel in accordance with the existing Pennsylvania Power and Light Company Quality Assurance Manual."

Quality Assurance Manual Procedure 8.2 states, in Section 4.4, "The Superintendent of Plant is responsible for Susquehanna SES during plant testing and startup and has overall responsibility for the Initial Test Program conducted by the Integrated Startup Group. The Superintendent of Plant delegates to the Plant Quality Supervisor the responsibilities described in the Preoperational Testing Inspection Function, SP-13, supplemental procedure."

Quality Assurance Manual Procedure SP-13, states, in Section 5.2.3, "Non-conformances detected during the performance of the preoperational testing inspection function shall be reported, controlled and dispositioned in accordance with QA Manual Procedure SP-11, as further amplified in the Plant Administrative Procedures Manual."

Plant Administrative Procedure AD-00-033, Attachment A Entry Number 8, states that a copy of the Nonconformance Report is sent to the Technical Supervisor for evaluation, to determine reportability to the NRC. Attachment A Entry Number 10, requires the signature of the Section Supervisor who is authorizing and approving the disposition.

Contrary to the above as of June 9, 1980, a nonconforming condition, defective yokes of valves labeled as HV-1F034C and D, identified during Residual Heat Removal system testing, was initially documented on Startup Work Request No. 1112, not a Nonconformance Report thereby permitting corrective action to be undertaken without the required evaluation for reportability or the approval of the disposition/corrective action.

This is an infraction.