## APPENDIX A

Washington Public Power Supply System P. O. Box 968 Richland, Washington 99352

Construction Permit No. CPPR-93

## NOTICE OF VIOLATION

Based on the results of NRC inspections conducted between May 17 and September 14, 1979, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC facility license No. CPPR-93 as indicated below.

A. 10CFR50, Appendix B, criterion.IX, states, in part, that "measures shall be established to assure that special processes, including...heat treating, ...are controlled and accomplished by...using qualified procedures..."

Paragraph D.2.5.9 of the WPPSS Quality Assurance Program documented in the PSAR states, in part, that "measures shall be established...to assure that special processes, including...heat treating...are accomplished...using qualified...procedures..."

Contrary to the above, on May 31, 1979, it was found that the piping post weld heat treating procedure no. PWHT-1, revision 4 (entitled "Post Weld Heat Treat Procedure No. 1) was implemented using a unique method of heat application without the benefit of qualification. The method employed electric resistance heater blankets placed along each side of the weld (approximately  $1\frac{1}{2}$  inches from the weld center line) rather than directly over the weld. This procedure had been used to heat treat safety related pipe welds including welds 6, 7, and 8 of Burns & Roe isometric drawing no. RFW-419-4.

This is an infraction.

B. 10CFR50, Appendix B, Criterion V, states, in part, that "activities affecting quality shall be prescribed by documented instructions..."

Paragraph D.2.5.5 of the WPPSS Quality Assurance Program documented in the PSAR states, in part, that "activities affecting quality shall be prescribed by documented instructions..."

Contrary to the above, on May 31, 1979, it was found that no written instructions had been developed for the operation or adjustment of pipe weld heat treating equipment designed and build for use on safety related piping systems, including welds 1A, 2, and 3 of Burns & Roe isometric drawing RFW-419-5.7.

This is an infraction.

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C. 10CFR50, Appendix B, Criterion XVII, states, in part, that "sufficient records shall be maintained to furnish evidence of activities affecting quality..."

Paragraph D.2.5. of the WPPSS Quality Assurance Program documented in the PSAR states, in part, that "sufficient records will be prepared as work is performed to furnish documentary evidence of the quality of items and of activities affecting quality..."

Contrary to the above, on May 31, 1979, it was found that sufficient records had not been maintained to furnish evidence of satisfactory heat treating of safety related pipe welding. For example, several heat treat record charts were illegible (e.g. welds 6, 7, 8 of Burns & Roe isometric drawing no. RFW-419-4); thermocouple indications were not recorded on some portions of the recorder charts (e.g. welds 1A, and 2 of Burns & Roe isometric drawing RFW-419-5.7); no operators names had been recorded on heat treating data records (e.g. welds 6, 7, 8 of Burns & Roe isometric drawing RFW-419-4, welds 1A, 2, and 3 of isometric drawing no. RFW-419-5.7); different and conflicting therocouple numbers had been recorded for the heat treatment of the same weld (e.g. the recorder charts and certification sheets for weld 8 of Burns & Roe isometric drawing RFW-418-4, weld 1 of isometric RFW-418-7.8, welds 6, 7, 8 of isometric RWF-418-4); different (and conflicting) dates of heat treatment had been listed on recorder charts and certification sheets (e.g. welds 4, 6, 7, 8 of Burns & Roe isometic RFW-418-4, welds 1, 1A, 2 of isometric RFW-418-5.6).

This is a deficiency.

D. 10CFR50, Appendix B, Criterion V, states, in part, that "activities affecting quality...shall be accomplished in accordance with...instructions, procedures, and drawings..."

Paragraph D.2.5 of the WPPSS Quality Assurance Program documented in the PSAR states, in part, that "...all project contractors for the nuclear related portions of the plant will be required to have a Quality Assurance Program...the program shall include the following items as ...applicable to the...construction for which the contractor is responsible." Paragraph D.2.5.5 states, in part, that, "activity affecting quality...shall be accomplished in accordance with...procedures...".

Contract 215 procedure no. PWHT-1 revision 4 (entitled "Post Weld Heat Treat Procedure no. 1), specifies that heating and cooling rates above  $800^{\circ}$ F shall in no case exceed  $400^{\circ}$ F per hour for ASME Section III requirements.

t • Contrary to the above, on May 31, 1979, it was found that recorder chart for weld 1A of Burns & Roe isometric drawing no. RFW-419-5.7 and weld 6 or 7 (records are somewhat illegible) of isometric drawing no. RFW-419-4 indicate periods of time when the heating and cooling rates exceed 400°F per hour.

This is an infraction.