

ARIZONA



PUBLIC SERVICE COMPANY

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March 26, 1980

ANPP-15104-JAR

U. S. Nuclear Regulatory Commission
Region V
Walnut Creek Plaza - Suite 202
1990 North California Boulevard
Walnut Creek, California 94596

Attention: Mr. G. S. Spencer, Chief
Reactor Construction and
Engineering Support Branch

Subject: I&E Inspection of January 21-25, 1980
File: 80-019-026

Dear Sir:

This letter refers to the Inspection conducted by Messrs. J. H. Eckhardt, G. Hernandez, D. F. Kirsh and L. E. Vorderbrueggen on January 21-25, 1980, as documented in your letter of February 27, 1980, of activities authorized by the Nuclear Regulatory Commission (NRC) Construction Permits Nos. CPPR-141, 142 and 143.

During this Inspection, two (2) items of noncompliance were identified. Our response to these items of noncompliance (Infractions) is presented in the enclosed Attachment A.

Very truly yours,

E. E. Van Brunt, Jr.
APS Vice President
Nuclear Projects
ANPP Project Director

EEVBjr/JAR:skc

Attachment

cc: L. W. Price
R. L. Robb
J. M. Allen
A. C. Rogers
B. S. Kaplan
W. E. Ide
A. C. Gehr
W. H. Wilson
W. J. Stubblefield
J. E. Bashore
R. M. Grant
D. R. Hawkinson

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ATTACHMENT A

Docket No. 50-528

Construction Permit No. CPPR-141

Notice of Violation

Based on the results of the NRC Inspection conducted January 21-25, 1980, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC Construction Permit No. CPPR-141 as indicated below:

1. 10CFR50, Appendix B, Criterion VI, Document Control, as implemented by PSAR Sections 17.1A.6 and 17.1B.6, requires that current documents be provided and used by contractors performing an activity and that superseded documents be properly controlled.

Bechtel Work Plan Procedure/Quality Control Instruction (WPP/QCI) No. 3.0, Field Control of Design Documents, Paragraph 11.4 states, in part, "Drawings distributed to craft stick file locations shall be stamped with the FCR/DCN stamp and all DCN's applicable to the drawing shall be entered by the Field Control Clerks"; Paragraph 11.6 states, in part, "Issued Design Documents superseded by updated Design Documents shall be stamped "Void-Not for Construction...."

Contrary to the above, on January 22, 1980, twenty-one (21) superseded electrical drawings, eleven (11) superseded mechanical/piping drawings and one (1) superseded civil drawing available for use were not stamped "Void-Not for Construction" and two (2) electrical drawings did not contain the FCR/DCN stamp or list the applicable DCN's. On January 24, 1980, in the auxiliary feedwater pump room, four (4) additional superseded drawings were not stamped "Void-Not for Construction" and did not contain the FCR/DCN stamp or list the applicable DCN's.

This is an Infraction.

Response

1. We were remiss in allowing a breakdown in our drawing control system. Our system requires that only drawings that are marked "Void-Not for Construction" be used for day-to-day activities such as; construction status, installation notes, records and general information. This stamping is used to separate these day-to-day drawings

from the most up-to-date controlled drawings used by quality control engineers for inspections and control. A review of the applicable work in the areas where "uncontrolled" drawings were found was conducted soon after the condition was discovered and no discrepancies were found.

Corrective Steps Which Have Been Taken

- On January 28, 1980, the Bechtel Project Superintendent issued an Inter-Office Memorandum (IOM) to all Superintendents reflecting that all gangboxes, print tables, foremen and general foremen desks, engineers and superintendents desks and files will be examined for unstamped drawings and all Unit General Superintendents shall assure that all personnel within their units are knowledgeable of the drawing control requirements of WPP/QCI No. 3.0.
- On February 1, 1980, the Bechtel Field Construction Manager issued an IOM to all Department Heads/General Superintendents/Unit Engineers/Lead Discipline Field Engineers reiterating his requirement for strict enforcement of the Project Drawing Control System.
- During February, 1980, Bechtel Quality Assurance conducted seven (7) surveillances on Units 1, 2 and 3 for compliance to Drawing Control requirements of WPP/QCI No. 3.0. A total of 952 drawings were reviewed for stick control, correct revision, Field Change Request or Design Change Notice status, loose and/or uncontrolled drawings. This revealed an approximate 1% deficiency of the samples surveyed. Immediate correction was made by cognizant Document Distribution Control Center (DDCC) personnel.

Corrective Steps Taken to Avoid Further Violation

- Corrective Action Request No. S-80-10 was initiated on February 7, 1980 as a result of the QA surveillance activity described in Paragraph 1(a). On February 21, 1980, Construction response stated that Unit General Superintendents have been advised that they shall assure all personnel within their unit are knowledgeable of the drawing control requirements of WPP/QCI No. 3.0 and DDCC personnel have conducted walk-down of facilities to purge the system of uncontrolled drawings.
- Bechtel Quality Assurance Audit No. 2-S-80-9 has been in progress during February/March of 1980 to examine in depth the Project's compliance to WPP/QCI No. 3.0. The scope of this audit includes verification that Management IOM's of Paragraph 1(a) above are being

complied with. Any failure to adhere to tightened controls applied to the Drawing Control System will be identified during the course of the audit and subject to correction and response through audit Corrective Action Requests.

Date When Full Compliance Will Be Achieved

- Corrective steps identified were completed on the dates stated in the preceding paragraphs.
 - It is expected that sufficient information and/or completion of corrective actions for Corrective Action Request S-80-10 will be available for follow-up surveillance and verification of compliance by April 1, 1980.
 - Completion and issuance of Audit Report 2-S-80-9, including applicable Corrective Action Requests, was achieved on March 21, 1980. It is expected that the audit response, verification and reaudit to close out corrective actions will be achieved by April 25, 1980.
2. 10CFR50, Appendix B, Criterion V, Instructions, Procedures and Drawings, as implemented by PSAR Section 17.1A.5, requires that activities affecting quality shall be accomplished in accordance with instructions, procedures and drawings appropriate to the circumstances.

Bechtel Work Plan Procedure/Quality Control Instruction (WPP/QCI) No. 100.0, "Weld Filler Material Control", Paragraph 5.6 states that, "At the completion of the work shift,....all unused filler material....shall be returned to the rod room"; Paragraph 5.10 states that, "All filler material issued to welders shall be carried in the proper container at all times."

Contrary to the above, on January 11, 1980, five (5) E6010 1/8" weld electrodes were lying loose on a desk shelf in the containment and on January 24, 1980, two (2) E7018 1/8" weld electrodes were inside a tool box in the turbine driven auxiliary feedwater pump room.

This is an Infraction.

Response

2. Upon discovery of the unauthorized weld rod, a survey of the area and Unit 1 was made by the Lead Welding Quality Control Engineer and it was determined that no welding was performed with the "uncontrolled" weld rod.

Corrective Steps Which Have Been Taken

- On March 5, 1980, Bechtel Quality Assurance conducted surveillance in Unit 1 Containment, Turbine, Fuel and Auxiliary Buildings for loose or unused weld rod. A total of twenty-six (26) gangboxes were inspected for uncontrolled weld electrodes. During this surveillance, only one (1) weld rod was found on the ground near a weld rod disposal can. This condition was corrected.
- The IOM, dated January 28, 1980, issued by the Project Superintendent relating to the search of all gangboxes, welder boxes and print tables for unstamped drawings, also required a search for any uncontrolled weld rod. None was found and the task was completed January 30, 1980.
- The twelve (12) Rod Room Attendants were retrained to the requirements of the weld rod distribution and disposal requirements of WPP/QCI No. 100.0, Revision 9. This was completed by February 8, 1980.
- Bechtel Quality Control searched Units 1 and 2 for uncontrolled weld rod and stubs and none were found. This task was completed on February 11, 1980.

Corrective Steps Taken to Avoid Further Violation

- Bechtel Weld Quality Control Engineers (QCE's) will conduct a surveillance for loose weld rod and/or proper disposal of rod stubs daily, to prevent further recurrence:
- Bechtel's Quality Assurance Audit Schedule for 1980 includes an audit to WPP/QCI No. 100.0 and No. 101.0 during the months of May and November to assure compliance to procedural requirements and commitments made that will prevent further violations.
- Area Superintendents have acknowledged and signed copies of the IOM referenced above to assure Management awareness for continued adherence to procedural requirements.

Date When Full Compliance Will Be Achieved

- Corrective steps identified above have been achieved on the dates provided.