

License No. CPPR-66

APPENDIX A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on September 12-14, 1977, it appears that one of your activities was not conducted in full compliance with conditions of your NRC Facility License No. CPPR-66 as indicated below. This item is a deficiency.

10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions ... and shall be accomplished in accordance with these instructions, procedures...."

The licensee's FSAR QA program, Section 17.1.5.1, states, in part, "The Met-Ed Quality Assurance Plan ... contains the requirement that activities affecting quality be documented by instructions, procedures.... This requirement is implemented by the major contractor...."

Burns and Roe, Inc. Specification 2555-69A, Section 3.7.4.5, regarding Instrumentation and Control Equipment Installation states, in part, "... that compression fittings shall be installed in accordance with the manufacturer's instructions." The manufacturer's instructions for installing instrumentation tube fittings specify a 1-1/4 turn for tightening of compression fittings after establishing the starting point using a scribe mark.

Contrary to the above, as of September 13, 1977, instrumentation tubing pressure connections involving compression type connections were not installed in accordance with the manufacturer's instructions as evidenced by the lack of the referenced scribe marks and quality control documentation.

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The inspector observed that the failed fuel Radiation Monitor installation had been completed, and that all other Radiation Monitors were in place waiting for completion of the electric power, control cables installation and the installation of sample line tubing.

The licensee stated this work is scheduled for completion by October 31, 1977.

No items of noncompliance were identified.

3. QC Records Review - Instrumentation Cables and Terminations

The inspector reviewed pertinent work and quality records relative to instrument cables, terminations and associated hardware to determine whether records meet established procedures and whether records reflect work accomplishment consistent with NRC requirements and SAR commitments for receipt inspection, material certification, installation records and cable nondestructive examinations (NDE).

a. Circuits Examined Include:

- Pressurizer Level Control - M845C
- Control Rod Drive Cooling Water - CR235C
- Intermediate Cooling System - CR852C
- Letdown Purification Demineralizer - MB433C
- 1B Steam Generator Emergency Feeder - MB350C
- 1A Decay Heat Removal Pump - HG5C
- Makeup Pump Discharge to Primary Loop - MA136C

- Makeup Pump to Seal Return Coolers - MA178C
- Reactor Building Pressurization - MB383C
- Makeup Pump Discharge to Primary Loop - M365C
- Reactor Building Cooling Unit E - SB62C

b. QC Documents Examined and Associated Circuit Include:

- (1) QC circuit installation report no. E-15921, dated August 12, 1976 for CR-235C1
- QC circuit installation report no. E-17934, dated August 12, 1976 for CR-235C1
- QC circuit installation report no. E-13404, dated March 15, 1976 for CR-852C
- QC circuit installation report no. E-12894, dated February 5, 1976 for MB-433C
- QC circuit installation report no. E-16552, dated October 3, 1976 for MB-350C
- QC circuit installation report no. E-13242, dated March 3, 1976 for HG-5C
- QC circuit installation report no. E-13001, dated February 11, 1976 for MA-136C
- QC circuit installation report no. E-13089, dated February 1, 1976 for MA-178C
- QC circuit installation report no. E-12915, dated February 6, 1976 for MB-383C
- QC circuit installation report no. E-21574, dated June 30, 1977 for M-365
- QC circuit installation report no. E-20092, dated April 5, 1977 for MC-365C

QC circuit termination report no. E-18444, dated February 3, 1977 for SB-62C

QC circuit termination report no. E-18933, dated February 17, 1977 for HG-51C

QC circuit termination report no. E-20714, dated May 12, 1977 for TD-952I

QC circuit termination report no. E-19865, dated November 12, 1977 for TD-951I

- c. The inspector examined Test Reports for each of the above circuits. Form TC-250-2 dated January 1, 1977 was used for documenting termination integrity, continuity check, integrity of field erection and bolt connection check.

In addition, the inspector reviewed the receiving/inspection report dated January 9, 1974 for cables purchased on P.O. #C-0108 per cable specification 2555-106 and the receiving/inspection report dated May 9, 1975 for cables purchased on P.O. #C-0084 per cable specification 2555-68 verifying that applicable documents conform with purchase requirements.

No items of noncompliance were identified.

4. Observation of Work and Work Activities - Instrumentation Components and Systems

The inspector examined instrument line installations, noting that compression type tube fittings had been used. The inspector observed that there were no visual indications or markings to indicate that the installation was in accordance with documented instructions/procedures.

Burns & Roe, Inc. Specification 2555-69A Section 3.7.4.5 on Instrumentation and Control Equipment Installation states, in part, "that compression fittings shall be installed in accordance with the manufacturer's instructions."

The manufacturer (Parker-Hanifin) Catalog No. 4230 for CPI tube fittings specifies a 1-1/4 turn for tightening of compression fittings and provides guidelines for establishing the starting point using a scribe mark.

The inspector requested that the licensee provide documentation indicating that compression type tube fittings had been installed per documented instructions.

The licensee representative stated they were not aware of this requirement and therefore do not have required documents.

The inspector informed the licensee that failure to follow procedures "was an item of noncompliance and a deficiency of 29 CFR 50, Appendix B, Criterion V, which states, in part: Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions"

5. Exit Interview

The inspector met with licensee and contractor representatives (denoted in Paragraph 1) at the conclusion of the inspection on September 14, 1977. The inspector summarized the scope and findings of the inspection. The licensee representative acknowledged the statement by the inspector with respect to the item of noncompliance (Paragraph 4).

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