

Appendix A

NOTICE OF VIOLATION

Based on results of the NRC inspection conducted during the period September 6, 7 and 10, 1979, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Construction Permits No. CPPR-126 and 127 as indicated below:

A. Personnel Not Properly Trained and Indoctrinated to Assure That Suitable Proficiency is Achieved and Maintained

Criterion II of Appendix B states in part that, "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Comanche Peak Steam Electric Station Quality Assurance Plan, Section 2.0, Revision 0, dated July 1, 1978, requires training to assure that personnel achieve and maintain the proficiency and qualifications required for the quality-related activities performed.

Contrary to the above:

It appears that all the Quality Control-Electrical personnel have not received the necessary training to achieve and maintain the proficiency required for the quality-related activities performed as evidenced by the following:

The NRC Resident Reactor Inspector (RRI) observed on September 5, 1979, two Brown & Root (B&R) Quality Control-Electrical Inspectors in the act of witnessing "megger" tests of Class IE safety-related cables. During the period of observation regarding testing of five cables, the RRI noted that the B&R QC personnel did not verify the identification of the cables being tested. Rather, they relied on the testing personnel to provide the information. The RRI determined that two of the cables tested were misidentified, and this misidentification was not detected by either the testing or QC personnel.

This is an infraction.

B. Failure to Follow Inspection Procedure for Returning Inspection Stamp

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with prescribed procedures, instructions, or drawings.

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Texas Utilities Generating Company Procedure CP-QP-15.1, "Inspection Stamp Control," requires, in paragraph 3.3, that inspection stamps shall be returned to the Product Assurance Supervisor upon request, termination or transfer of the individual.

Contrary to the above:

The NRC Resident Reactor Inspector (RRI) determined that the individual assigned inspection stamp number thirteen on June 16, 1978, was later transferred from the site Quality Assurance Unit to the Electrical Engineering Unit (date not established) and subsequently terminated his employment in May 1979 without having returned the stamp to the Product Assurance Supervisor.

This is a deficiency.

C. Failure to Follow Inspection Procedure to Initial and Date Operation Traveler

Criterion XVII Quality Assurance Records of Appendix B states in part, "Inspections and test records shall, as a minimum, identify the inspector"

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with prescribed procedures, instructions, or drawings.

Brown & Root Procedure CP-CPM-6.3, "Preparation, Approval and Control of Operation Travelers," in paragraph 3.7.1, states that, "Each QC Operation requires the initials and date denoting the inspection status. This shall be accomplished at the completion of each operation and prior to moving parts or assemblies to the next operation, unless otherwise noted on the Traveler."

Contrary to the above:

The NRC Resident Reactor Inspector (RRI) observed, on or about August 22, 1979, that a Class IE battery rack was complete and that measures were being taken to install the batteries. During a subsequent review of Operation Traveler EE79-036-01DD for installation of the Class IE battery rack, the RRI observed that the Traveler indicated that only four of the seven steps requiring QC verification were initialed and dated on September 5, 1979. The RRI interviewed the responsible QC inspector and established that work shown as being inspected on September 5, 1979, was actually accomplished sometime in July 1979, but that the Traveler was not available to him to initial and was perhaps lost for a period of time.

This is a deficiency.

D. Failure to Follow Procedure for Verification of Performance of Automatic Welding Machines

10 CFR 50, Appendix B, Criterion V, "Inspection, Procedures and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings.

Comanche Peak Steam Electric Station Construction Procedure 35-1195-WCP-6, "Electronic Alignment, Performance Verification and Maintenance of Dimetrics Gold Track 11 Automatic Welding Sytem," (Interim Change 1 to Revision 0) requires, in paragraph 4.2.3, that performance verification be accomplished by the QA/QC department and requires, in paragraph 4.3.2, that weld parameter monitoring be accomplished in accordance with Appendix 3 of the subject procedure.

Contrary to the above:

The NRC Resident Reactor Inspector verified through interviews with personnel who maintain the automatic welding machine, with QA/QC supervisory personnel, and by a review of pertinent records, that QA/QC has not verified the performance of the machines as required by the above procedure nor has the weld parameter monitoring been accomplished in accordance with Appendix 3 of the procedure.

This is an infraction.