

Appendix A

NOTICE OF VIOLATION

Cincinnati Gas and  
Electric Company

Docket No. 50-358

Based on the results of the NRC investigation conducted on April 11-13, 18, and 26-27, 1979, it appears that certain of your activities were in noncompliance with NRC requirements as noted below. These items are infractions.

1. Contrary to 10 CFR 50, Appendix B, Criterion III, which states, in part "Measures shall be established to assure that applicable regulatory requirements and the design basis. . . are correctly translated into specifications, drawings, and procedures. . ."

In paragraph 3.8.4 and Table 3.82, the Zimmer FSAR states that structural welding will be performed to AWS D.1.1-72 requirements. The Zimmer Nuclear Power Station Quality Assurance Manual, in paragraph 3.3.1 states "it is the responsibility of the designers to translate the design principles into workable documents which encompass the regulatory criteria, pertinent operating experience and applicable codes and standards."

Contrary to the above, the inspectors identified that:

- a. The heating, ventilation, and air conditioning specification, H-2298, prior to August 8, 1978, did not specify that seismic category one hangers were required to be welded and inspected to American Welding Society (AWS) D.1.1 requirements, although most of this work was completed or in progress by that time.
- b. Furthermore, specification H-2298 did not specify that gaskets, flexible connections and sealants utilized in conjunction with the heating, ventilating and air conditioning duct work must successfully withstand relevant environmental conditions such as radiation and temperature as specified in Table 3.11.4 of the Zimmer FSAR.

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2. 10 CFR 50, Appendix B, Criterion IX requires that "Measures shall be established to assure that special processes, including welding, . . . are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

The Zimmer Nuclear Power Station QA Manual in paragraph 9.1, states: "Procedures for special processes such as forming, bending, welding, . . . are reviewed by Sargent and Lundy. in accordance with project specification requirements, these procedures must be submitted to Sargent and Lundy and accepted prior to the start of component fabrication."

Contrary to the above, a brazing procedure to join portions of the heating, ventilating and air conditioning duct work consisting of stainless steel to their support hangers was not submitted and approved by Sargent and Lundy prior to commencement of the work. Portions of the duct work material are type 304 stainless steel, and the hanger material is type ASTM A36 carbon steel. While procedures had been approved for joining of carbon steel duct work to carbon steel hangers, no procedure had been approved for brazing of portions of the duct work consisting of stainless steel to the carbon steel hangers.

3. 10 CFR 50, Appendix B, Criterion XVIII requires that a comprehensive system of planned and periodic audits be performed to verify compliance with all aspects of the Quality Assurance program and to determine the effectiveness of such programs.

The Zimmer Nuclear Power Station QA Manual, in paragraph 18.1, states: "The QA and S section conducts a comprehensive system of planned and periodic audits of Sargent and Lundy, Kaiser Engineers, and General Electric, to verify compliance with all aspects of the Quality Assurance programs. Audits of vendors supplying materials or services at construction sites are also performed."

Contrary to the above, Cincinnati Gas and Electric failed to assure that the Waldinger Corporation performed an annual audit for their Zimmer site operations during calendar year 1978, as required by their Quality Assurance Manual.