APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Co. Docket Nos. 50-352
50-353

This refers to the inspection conducted by representatives of the Region I (Philadelphia) Office at the Limerick Generation Station, Units 1 & 2, Limerick, PA; of activities authorized by NRC License Nos. CPPR-106 and CPPR-107.

During this inspection, conducted on October 17-19, 1978, the following apparent items of noncompliance were identified:

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

Section D.6.1.2 of Appendix D of the PSAR states, in part, "Bechtel Project Management is responsible for monitoring to assure that the quality control requirements for the storage of components .. are effectively implemented."

Section D.4.9.1 of Appendix D of the PSAR states, in part, "... equipment vendors shall have written instructions to govern the... storage... and preservation of the items... to prevent degradation..."

Bechtel Job Rule No. 8031-JR-G-7, Rev. 14, states that equipment should be stored and maintained in accordance with vendor instructions unless modifications to vendor instructions are approved by Project Field Engineer.

Contrary to the above, as of October 18, 1978:

A. The HPCI and RCIC turbines were stored "Inside Unheated Controlled" in lieu of "Inside Heated" as specified by vendor.

B. Terry Turbine Procedure SP-11 was implemented in 1972 and was still in use although it use was limited to a duration of three years.

C. A required quarterly check on the condition of humidity indicator cards on the HPCI turbine was erroneously deleted from the maintenance and inspection program at the end of 1977.

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D. Electrical equipment on the HPCI turbine was not protectively wrapped in accordance with vendor requirements.

This item is an infraction applicable to Docket No. 50-352.

II. Criterion V of 10 CFR 50, Appendix B, requires, in part, that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Quality Assurance Program implementation described in the Limerick Generating Station Units 1 and 2 PSAR, Appendix D, states in paragraph D.6.4, in part, that, "(Bechtel) Quality Control Engineers... are responsible for preparing Inspection Plans in accordance with the Field Inspection Manual, (and) performing Quality Control inspections..."

The Quality Control Inspection Report (QCIR) form used to implement Bechtel Quality Control Instruction 8031-C-1.40, "Post-Placement Inspection of Concrete," provides in paragraph 2.2d for inspection of the following activity:

> "For forms that support concrete members, concrete cylinder test report reviewed to verify that concrete has attained the specified strength prior to form removal."

Bechtel Drawing 8031-C-637 (Rev. 7) states, in part, regarding the removal of temporary supports for the fuel pool girder beams, in Section 3.5.2.7 that,

> "The posts at or near lines 14.1, 15.5, and 21.5, shall be removed after the girder concrete is placed to a minimum of El. 326'-0", and reaches a compressive strength of 5,000 psi..."

Contrary to the above on October 17, 1978, Bechtel QCIR C-1226-RW-ST-13-4 for the post-placement inspection of the East Fuel Pool Girder concrete to elevation 326'-0" indicated, with a "N/A" comment placed next to the requirements of paragraph 2.2d, that no quality control inspection had been performed to verify concrete strength had attained the 5,000 psi required prior to support removal.

This item is an infraction applicable to Docket No. 50-352.

III 10 CFR 50, Appendix B, Criterion XV, states, in part, that: "Nonconforming items shall be reviewed and accepted, rejected, repaired, or reworked in accordance with documented procedures."

The Limerick PSAR, Appendix D, QA Program, Paragraph D.4.10, states, in part, that the subcontractor "... shall have written procedures governing the identification, control, and disposition of materials, parts, or equipment that do not meet specification requirements. Repairs shall be in accordance with documented instructions."

The QA Manual, Section 15.3.1 for Schneider Sheetmetal, the heating and ventilating subcontractor, states, "The QC supervisor shall have a nonconformance and disposition report prepared when an item is not in accordance with the design drawing and specification."

Contrary to the above, on October 18, 1978, a seismic class I duct section (DWG No. 1057-1 piece No. 72) for a fire protection damper was not constructed in accordance with the design drawing, and was being reworked to meet drawing requirements, without the preparations of a noncompliance and disposition report.

This item is an infraction applicable to Docket No. 50-352.

IV Criterion XVII of 10 CFR 50, Appendix B, requires in part, that "sufficient records shall be maintained to furnish evidence of activities affecting quality."

The Quality Assurance Program implementation described in the Limerick Generating Station Units 1 and 2 PSAR, Appendix D, indicates in paragraph D.6.4, in part, that "Procedures (are) used to control and perform inspections by (Bechtel) Quality Control Engineers..."

Bechtel Job Rule 8031-JR-[illegible], Revision 14, states, in part in paragraph 3.4 that, "The Project Field Quality Control Engineer is responsible for surveillance and documentation of excavation to assure compliance with the referenced criteria and this instruction."

Contrary to the above, no documentation could be produced to indicate that Bechtel Quality Control had performed any inspection activity for the design change chipping work accomplished on the Unit 2 containment concrete and governed by the restrictions and requirements of approved Field Change Request (FCR) C-1933F.

This is a deficiency applicable to Docket No. 50-353.