

Appendix A

NOTICE OF VIOLATION

Detroit Edison Company

Docket No. 50-341

Based on the inspection conducted on November 13-17, 1978, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. Items 1 and 2 are infractions. Item 3 is a deficiency.

1. 10 CFR 50, Appendix B, Criterion IX requires that nondestructive testing be controlled and accomplished by qualified personnel using qualified procedures.

Edison QA Manual, QAP No. 10, paragraph 10.1.2 states in part, "Contractors and vendors are responsible for assuring that special processes are performed using qualified procedures and qualified personnel and under controlled conditions..."

GEI and SE procedures No. NDE-PT-1002, Revision 3, "Liquid Penetrant Examination Procedure" paragraph 13.0 states in part, "After completion of the liquid penetrant examination, all traces of penetrant and developer shall be removed.... Cleaning will continue until no trace of developer or penetrant is visible on the cleaned surface". Paragraph 14.0 requires the recording of examination evaluations on a process data sheet or an examination report.

Contrary to the above, the inspector observed the following inside the reactor pressure vessel:

- a. Penetrant and developer solution had been applied to the inside diameter of the feedwater nozzle (90° Az) on November 11, 1978, however, the penetrant/developer solution had not been cleaned as of November 13, 1978. Penetrant stain also was evident on the vessel wall below the adjacent feedwater nozzle indicating inadequate cleaning.
- b. No test report had been made although indication on the feedwater nozzle (90°) exceeded the acceptable limits. No nonconformance tag was affixed to identify the unacceptable condition.

- c. An area on the wall near the bottom of the vessel also had residual penetrant solution. The area had not been adequately cleaned.
  - d. Two jet pumps were randomly selected, and the circumferential weld made on the large inside diameter of the diffuser were inspected. Penetrant and developer had not been cleaned from one of the welds on one of the two jet pumps.
2. 10 CFR 50, Appendix B, Criterion XIII requires that materials and equipment handling, storage and preservation be controlled in accordance with work and inspection instructions to prevent damage or deterioration.

Edison QA Manual QAP No. 14, paragraph 14.0.1 stated in part, "Written work and inspection procedures shall be implemented to control the handling, storage, ..., of material and equipment to assure the maintenance of quality from source through installation or use".

Contrary to the above, the inspector observed the following on November 14, 1978:

- a. RHR Swing Check Valve, 18" gate, E11-50 (P4500) in the RHR service building was not adequately stored or protected, since the valve was mixed with miscellaneous metal and the end cap had a hole in it allowing dust and foreign particles to enter.
  - b. Two check valves C11-52 (V82081) were not properly protected, since the valves were among miscellaneous metal and the end cap on one valve was missing.
3. 10 CFR 50, Appendix B, Criterion XVII requires that records shall include closely related data such as qualification of personnel.

Edison QA Manual, QAP-1, paragraph 1.9.1 states, "Minimum qualifications shall be established for personnel who perform quality assurance functions."

Contrary to the above, the inspector found that one civil QC inspector hired in February 1977 was not visually tested until June 9, 1978. Record of adequate vision is a minimum qualification for inspection personnel.