

APPENDIX A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on January 10-13, 1977 it appears that certain of your activities were not conducted in full compliance with conditions of your NRC Facility License No. CPPR-66 as indicated below. These items are infractions.

- A. 10 CFR 50, Appendix B, Criterion X states, in part, "A program for inspection of activities affecting quality shall be...executed... to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

The licensee's FSAR, paragraph 17.1.10.4 states, in part, "Activities affecting quality are verified by inspections....Their (UE&C) activities are conducted in accordance with written procedures, instructions, and checklists..."

United Engineer's and Constructor's (UE&C) "Quality Control Final Acceptance Inspection Checklist," items 2 and 3, states, in part, "All piping free from...arc strikes..." and "Hangers...installed in accordance with reference drawings and temporary supports removed."

Contrary to the above, on or about January 11-12, 1977, an examination of the Class 2 main steam piping from steam generator RC-H-1B to the containment penetration R-619 and the Class 2 emergency feedwater piping from containment penetration R-623 to steam generator RC-H-1A revealed quality control final acceptance inspection checklist nonconformities not recorded by the licensee's Phase I inspection program, although the applicable inspections had been completed. Specifically, hanger EFH-45S in the emergency feedwater system did not meet Bergen-Paterson Drawing No. 1691-1 clearance requirements. Also, 2 arc strikes and 3 temporary attachment welds on the main steam line had not been recorded for further disposition.

- B. 10 CFR 50, Appendix B, Criterion X, states in part, "A program for inspection of activities affecting quality shall be...executed... to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

The licensee's FSAR, paragraph 17.1.10.4, states, in part, "Activities affecting quality are verified by inspections....Their (UE&C) activities are conducted in accordance with written procedures, instructions, and checklists..."

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UE&C's Electrical Construction Procedure ECP 3-2, "Receiving, Storing, Handling, and Installing Wire and Cable," Revision 8, Paragraph 4.12, states in part, "All cable installed in cable trays shall be securely tied down to the tray rungs." Also, "Vertical cable runs two inches in OD and smaller are to be tied down at intervals of 27 to 36 inches as required."

Contrary to the above:

1. On January 11-12, 1977 safety related cables on several vertical cable trays were observed to be tied to the outside of rods clamped across the top sides of the cable trays rather than to the cable tray rungs. These rods were not shown on construction drawings, and their spacing exceeded the maximum tying interval for vertical cable runs. Installation of these cables had been inspected by the constructor's Quality Control group and the nonconforming conditions had not been identified.
 2. On January 12, 1977 the installation of 4160 volt bundle (HH30 circuit cables Emergency Feedwater Pump Circuit) was observed to have been tied to flat pieces of metal wrapped with tape and bolted to the side of the metal enclosure of the bus bars. This installation had been accepted by the QC inspector although neither the Electrical Construction procedures nor the installation drawings show this type of installation as acceptable.
- C. 10 CFR 50, Appendix B, Criterion V states, in part "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures, or drawings...."

The licensee's FSAR, paragraph 17.1.5.4 states, in part, "The UE&C Quality Assurance Plan...specifically delineates provisions for assuring that all quality related activities...are performed in accordance with specification, procedure and drawing requirements."

Paragraph 3 of Section VII of the licensee's QA Plan covering the preparation and review of specification and procedure states, in part, that "The site QA group ensures that the UE&C prepared procedures include necessary quality control provisions and are in accordance with applicable...Burns and Roe specifications..."

Contrary to the above, on January 11-12, 1977:

1. UE&C Electrical Construction Procedure ECP 3-2, Revision 19 and drawing for installation of 4160 volt cables were observed not to include the requirement of B and R Specification 2555-70 that "...all bus direct terminations at switchgear and auxiliary transformers, and any uninsulated bus duct joints shall be insulated using a high voltage heat shrinkage connection kit..."
2. The 4160 volt cables for the Emergency Feedwater Pump (circuit HH 30 P) had been connected to the bus in the switchgear without use of the high voltage heat shrinkable insulating sleeve and the installation had been accepted by Field QC.
3. UE&C Electrical Construction Procedure ECP 8-2 Revision 17 for Receiving, Storing and Installation of Cable Tray and Conduit does not conform to the requirements of B and R specification 2555-70, Section 16S-2 in that specification 2555-70 provides that 1 inch thick ruggedized "M-Board" be used for fire barrier material while ECP 8-2 identifies 1/2 inch thick "Marinite 36" as the fire barrier material.