

APPENDIX A

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-329, 50-330

Based on the results of an NRC inspection on May 24-27, 1977, it appears that one of your activities were not conducted in full compliance with conditions of your NRC Facility Licenses No. CPPR-81 and No. CPPR-82 as indicated below. This matter is an infraction:

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

- A. The Bechtel Technical Specification 7720-M-326, states, in part, in paragraph 5.11: "If the gap (between the steel bearing plates and the concrete wall) exceeds 1/16" or if the clearance exists over more than 20% of the bearing area, grouting is required. . . ."

The Bechtel Quality Control Inspection Record (QCIR) No. P-2.10-610-3 for pipe support 18-1HCB-2-H9 and QCIR P-2.10-610-4 for pipe support 3-1FCB-28-H5 requires in paragraph 3.4.b that: "clearances between steel plates and concrete surfaces as specified. . . .(reference Technical Specification 7720-M-326, paragraph 5.11)

Contrary to the above, on May 24, 1977, the inspector observed that the clearances between the concrete wall and the steel bearing plates for pipe supports 18-1HCB-2-H9 and 3-1FCB-28-H5 exceeded 1/16" inches and that these supports had been inspected and accepted by quality control without grouting.

- B. The Bechtel Quality Assurance Manual - ASME III, Division 1, paragraphs 3313 and 3415 state, in part: "Revisions to drawings are processed in the same manner as the original drawing. Drawings may be modified by means of. . . .project engineer approved Field Change Requests FCR's as described in paragraph 3415. . . . The FCR provides field engineering with the means of reporting to project engineering discrepancies in project drawings, such as interferences or changes in arrangement required by job conditions. . . ."

Contrary to the above, the inspector observed safety related pipe supports 10-1GCB-23-H2 and 12-1HBC-124-H5 being assembled during the period May 24-26 with handwritten drawing changes provided by the field engineering staff that had not been processed in accordance with the BQAM.

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- C. Consumer's Electric Plant Projects QA Services Department Procedures No. 10 and No. 12, Sections 5.3.3 and 5.2.3, state, in part: "Within approximately ten working days after completion of audits, prepare audit report using audit report form (Attachment C)."

Contrary to the above, on May 25, 1977, the inspector found that Audit Report Nos. F-77-4, F-77-1, F-76-58, and F-76-52, had not been prepared and issued although the audits were completed three to seven months earlier.

- D. Consumer's Midland Project QA Procedure No. M-10, Section 5.0, states, in part: "The first step in detecting trends is logging of all nonconformances and audit findings since January 1, 1976, on a common document (Deficiency Log, Attachment M-10A). . . . "the next step is classification." . . . "The initial division of NCR's and findings into categories is reviewed by the Quality Assurance Superintendent for field deficiencies and by the Midland Quality Assurance Administrator for deficiencies found by General Office Personnel. Subsequent additions are reviewed quarterly in the same manner. These reviews are documented by signing the M-10B form." . . . "If a review . . . reveals that there have been occurrences of the same problem within the specified time span which constitute a trend, either a Trend Analysis Report, Attachment 10C, or a nonconformance report identifying the problem as a trend is completed."

Contrary to the above, on May 26, 1977, the inspector found that only 61 of 97 NCR's, issued since January 1, 1976, were logged. Only a small percentage of the audit findings had been logged. No logging or classification had been accomplished for 1977. Consequently, no review for trends was accomplished in accordance with the procedure.

- E. Champion Batch Plant Quality Control Manual, Section 15, states, in part: "Measuring equipment found defective shall be tagged and corrective action taken."

Contrary to the above, on May 27, 1977, the inspector observed that automatic scale, SN 533465, was not being used to weigh ice, rather manual scale SN 29742 was used. It was learned that the automatic scale was found defective the previous day. The scale was moved one-to-two feet from the area where ice was weighed; however, the defective equipment was not tagged as the procedure required.