

ENCLOSURE

Consumers Power Company

License No. CPPR-81

License No. CPPR-82

NOTICE OF VIOLATION

Based on the results of inspections conducted during April and May, 1976, of quality assurance activities related to your Midland site, it appears that certain of your activities as indicated below were not conducted in full compliance with NRC requirements. These items are considered to be infractions.

1. 10 CFR Part 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings"

Contrary to this requirement, documented instructions were not available for the drilling and placement of reinforcement steel dowels which were being imbedded in concrete structure to replace omitted rebar.

2. 10 CFR Part 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 documented instructions, procedures, or drawings"

Bechtel Power Corporation Field Inspection Procedure G-3, which implements the requirements of Criterion V, states in Section 4.10.1 and 4.10.3 that, "The PFQCE (Project Field Quality Control Engineer) shall route a copy of the completed NCR to the organization responsible for control of the activity which apparently caused the nonconformance. Each such organization will evaluate the feedback information provided by the NCR and initiate whatever corrective action may be warranted to prevent recurrence." and "The PFQCE shall also route a copy of the completed NCR to the site QAE for his evaluation and use in determining the need for corrective action to prevent recurrence."

Contrary to these requirements, nonconformance reports concerning reinforcement steel deficiencies were not adequately evaluated to determine the need for corrective action to prevent recurrence, either by the organization responsible for control of the activity or by the quality assurance engineer.

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3. 10 CFR Part 50, Appendix B, Criterion X states in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity, to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity. . . . Examinations, measurements, or tests of material or products processed shall be performed for each work operation where necessary to assure quality. . . ."

Contrary to the above, in some instances installation of reinforcement steel on safety-related structures requiring inspection were not adequately inspected to verify conformance with applicable drawings.

4. 10 CFR Part 50, Appendix B, Criterion XVI, requires that, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management."

Contrary to this requirement, Nonconformance Report No. 260 issued on December 23, 1974, and resolved on November 3, 1975, covering the omission of reinforcement steel in several wall areas within the auxiliary building, did not contain a meaningful evaluation relative to the significance of the problem and its reportability pursuant to the requirements of 10 CFR Part 50, Paragraph 50.55e.

5. 10 CFR Part 50, Appendix B, Criterion XVII requires in part that, "Sufficient records shall be maintained to furnish evidence of activities affecting quality. The record shall include at least the following: Operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses. . . . Inspection and test records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted. Records shall be identifiable and retrievable. . . ."

Contrary to this requirement, the results of reviews, interim inspections and monitoring of reinforcement steel installations were not documented with regard to the type of observation or the findings, nor did they contain the action taken in connection with any deficiencies noted.