

Appendix A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted April 21-25, 1980, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Construction Permit No. CPPR-103 as indicated below:

A. Failure to Follow Procedures for the Documentation of the Quality Assurance Program

Criterion V of Appendix B to 10 CFR 50 requires 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 "NISCO QA Manual - ASME Section III," Section 4.4.3 requires that a Vendor Performance Record File be maintained in the NISCO home office, with copies of the records in this file forwarded to the Field QA/QC Manager. Section 15.2.2.3 requires that the entire QA program be audited on an annual cycle to verify its implementation.

Contrary to the above:

On April 23, 1980, during a review of quality records associated with audits, the IE inspector discovered that copies of the records in the Vendor Performance Record Files were not available at the site as required by Section 4.4.3 for vendor audits applicable to the job site. In addition, a review of audits 3015-1 through 3015-17 determined that the entire Quality Assurance program had not been reviewed during the twelve month period of 1979 as required by Section 15.2.2.3. The NISCO QA/QC personnel agreed that an audit of the entire program could not be demonstrated for 1979.

This is an infraction.

B. Failure to Perform Required Inspections as Prescribed in Contract Inspection Procedures

Criterion V of Appendix B to 10 CFR 50 requires 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 "NISCO QA Manual - ASME, Section III," Section 5.6.5 requires that periodic inspections of the storage areas be conducted by the Field QA/QC Manager

or his designee to preclude damage to safety-related materials or components while in storage. NISCO Procedure ES-67-CE, "General Cleaning and Housekeeping," requires a daily inspection and examination of the storage area for conformance to specification requirements. In addition, "Care and Maintenance Instruction #36" requires a monthly inspection of the general condition of the Flow Baffle Assembly and the Reactor Vessel Closure Head Lifting Rig, two components currently in the NISCO storage area at the time of this inspection.

Contrary to the above:

On April 23, 1980, the IE inspector determined, from a review of daily inspection reports and from discussions with contractor inspection personnel, that the daily inspections have not been performed as required since 1978. In addition, during observation of the storage conditions of the Flow Baffle Assembly and the Reactor Vessel Closure Head Lifting Rig, it was determined from the lack of records and from discussions with NISCO QC personnel that inspections defined by "Care and Maintenance Instruction #36" had not been performed on a monthly basis as required for this equipment since equipment receipt by NISCO in February 1980.

This is an infraction.

C. Failure to Follow Contract Procedures Relative to the Storage of Safety-Related Equipment

Criterion V of Appendix B to 10 CFR 50 requires 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.

Section P.9 of the Ebasco Contract Specification for NISCO, Contract No. W3-NY-18, requires that the contractor abide by the guideline provisions of ANSI N45.2.2, "Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants." Section 6.1.1 requires that during construction the possibility of damage to materials or components or the lowering of quality due to corrosion, contamination, or deterioration be minimized. Section 6.1.2 requires that items such as piping be stored on cribbing or equivalent to allow for air circulation and to avoid trapping water, and that storage areas be marked and designated for storage. Section 6.3.3 requires that all materials be identified, with proper protection from movement of equipment.

Contrary to the above:

On April 23, 1980, during a tour of the NISCO storage area, the IE inspector observed the following:

1. The NISCO storage area was not identified nor its boundaries defined as a storage area for safety-related components.

2. Surge Line Restraints (E8-E6-W1) were not properly stored on dunnage; some of the dunnage was stacked on top of the restraints.
3. The Reactor Vessel Closure Head Lifting Rig did not have identification tags.
4. The Flow Baffle Assembly (NISCO RIR-211, P.O. 403402) was outside of its storage container without proper protection from damage due to movement of equipment.

This is an infraction.

D. Failure to Follow Contract Procedures Relative to the Care of Safety-Related Piping

Criterion V of Appendix B to 10 CFR 50 requires 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.

Section P.9 of the Ebasco Contract Specification for Tompkins-Beckwith, Contract No. W3-NY-11, requires that the contractor abide by the guideline provisions of ANSI N45.2.2, "Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants." Section 6.1.1 requires that during construction the possibility of damage to materials or components or the lowering of quality due to corrosion, contamination, or deterioration be minimized. Also, Section 6.1.2 requires that items such as piping be stored on cribbing or equivalent to allow for air circulation and to avoid trapping water.

Contrary to the above:

On April 23, 1980, during a backshift inspection, the IE inspector observed three spools of Component Cooling Water Piping lying directly on the concrete flooring in the Reactor Containment Building at Elevation 0. The piping (3CC-10-13A/B-11, 3CC-10-57 and 3CC-10-33B-22-1) was not segregated from the storage of other materials to minimize damage. These other materials included reinforcing steel, tools, pieces of scaffolding, and other items apparently used by the construction trades working in the area.

This is an infraction.