

Appendix A

NOTICE OF VIOLATION

Illinois Power Company

Docket No. 50-461

Based on the results of the NRC inspection conducted on April 14-18, and 21-22, 1980, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. Items 1, 2, and 3 are infractions. Item 4 is a deficiency.

1. 10 CFR 50, Appendix B, Criterion XIII states, in part, "Measures shall be established to control the handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration".

Illinois Power Company Quality Assurance Manual Chapter 13, Section B.5 states, in part, "Written instructions shall be provided for the preservation of items . . . during storage . . . construction and installation."

Contrary to the above, requirements for the preservation and maintenance of equipment removed from the warehouse and stored in-place or installed in the plant are not addressed in Procedure BAP 2.4 "Storage and Maintenance".

2. 10 CFR 50, Appendix B, Criterion II requires, in part, that the licensee identify the structures, systems and components to be covered by the quality assurance program and that the quality assurance program provide control over activities affecting the quality of the identified structures to their extent consistent with their importance to safety.

Illinois Power Company Quality Assurance Manual, Chapter 2 requires, the IP Quality Assurance Program to apply to activities including design, procurement, fabrication, construction, inspection and related testing.

Contrary to the above, IP Quality Assurance Program did not provide control of the site settlement monitoring program which was inadvertently identified as non-category I on drawing S-20-1004, Revision C. The results of the monitoring program are required to assure that the foundation for Category I structures are providing their intended function and within the limits established for the structure design basis.

No response to the above item is required since during the inspection IP has designated the settlement monitoring program as Category I and included the program within the quality assurance program control.

3. 10 CFR 50, Appendix B, Criterion VII, requires, in part, that measures shall be established to assure that purchased material, equipment and services conform to the procurement documents.

Illinois Power Company Quality Assurance Manual, Chapter 7 requires, receiving and/or source inspections to be performed as necessary to ensure that purchased material equipment and services conform to the requirements identified in the procurement documents. The procurement document for purchase of miscellaneous structural steel and embedded parts in Specification K-2949 require inspection and testing of embedded plates to be in accordance with the requirements of AWS D1.1 welding code.

Contrary to the above, measures were not established to assure conformance to procurement documents in that, the NRC inspector identified the following conditions on embedded plates accepted by the fabricator and in storage on-site:

- a. Automatic machine welded studs with manual welded repairs which had not been tested as required by AWS.
  - b. Studs on embedded plates had been bent greater than the maximum bend of 30°.
  - c. Studs broken or partially broken off.
  - d. Studs without the required 360° weld flash that were not bend tested according to AWS.
4. 10 CFR 50, Appendix B, Criterion XVIII; Illinois Power Company PSAR Chapter 17, paragraphs 17.1.2.1 and 17.2.18.2; Illinois Power Company QA Manual Chapter and ANSI N45.2.12, Draft 3, Revision 4, Section 3.4.2 requires that "applicable elements of the Quality Assurance . . . program . . . be audited at least annually".

Contrary to the above, applicable elements of the Quality Assurance program have not been audited annually, in that, General Electric Company has been involved in directing the installation activities of the reactor internals at the Clinton site for greater than one year and has not been audited by the licensee. This item is a deficiency.