

Appendix A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on April 29-May 2, 1980, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Construction Permit No. CPPR-147 as indicated below:

A. Improper Storage of Safety-Related Items

10 CFR 50, Appendix B, Criterion V states: "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."

Daniel Construction Procedure AP-VIII-07, "Material Issue," requires material, after being issued from warehouse control, to be stored in accordance with Daniel Construction Procedure WP-I-01, "Receipt, Storage and Preservation of Safety-Related Materials and Items."

WP-I-01 references ANSI N45.2.2, "Packing, Shipping, Receiving, Storage and Handling of Items for Water Cooled Nuclear Power Plants."

ANSI N45.2.2, Section 6.1.2, "Levels of Storage," requires that items shall be stored on cribbing or equivalent to allow for air circulation and to avoid trapping water.

Contrary to the above:

On April 29, 1980, approximately ten stainless steel spool pieces and fittings, including IEJ-01-S-010/12 and LPC1-EN-01-S-007/112, were observed standing on the floor in water and excessive dirt on the lower level of the Auxiliary Building.

This is an infraction.

B. Failure to Identify Nonconforming Conditions

10 CFR 50, Appendix B, Criterion V states: "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."

Daniel International Construction Procedure No. AP-VI-02, Revision 8, "Nonconformance Control and Reporting," Section 4.1.1 requires that all project personnel identify any material nonconformance or nonconforming activity and bring it to the attention of Quality Control or Engineering.

Contrary to the above:

1. Reactor Cavity Damaged Concrete

On April 29, 1980, during the observation of the spalled concrete in the reactor cavity, the IE inspector identified cracks in the concrete adjacent to the stainless steel refueling cavity seal ring. The damage apparently occurred during the vessel setting procedure and had not been reported to Quality Control or Engineering.

2. Fuel Building Transfer Canal Concrete Damage

During a site tour conducted November 28, 1979, the IE inspector identified broken concrete in six separate areas around the Fuel Building fuel transfer canal in placement No. OC-611-S04. The damaged areas had not been identified to Quality Control or Engineering. This item had previously been considered an unresolved item.

This is an infraction.

C. Failure to Provide Adequate Test Procedures

10 CFR 50, Appendix B, Criterion V states: "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."

10 CFR 50, Appendix B, Criterion XI requires, in part, that testing be performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above:

During in-place relative density testing of the Ultimate Heat Sink (UHS) Dam, a change in the test acceptance criteria was initiated by the Level I - Soils inspector without procedural authorization. Specifically, the reference to Proctor Density Test No. LW-60 in Field Density Test No. LQ 222 was changed to Proctor Density Test No. LW-81 in Field Density Test No. LQ 223, which was a retest of No. LQ 222.

This is an infraction.

D. Failure to Provide a Timely Written Report for a Construction Deficiency

10 CFR 50.55(e), "Conditions of Construction Permits," states in part: ". . . . The holder of a construction permit shall submit a written report on a reportable deficiency within thirty (30) days to the appropriate NRC Regional Office"

Contrary to the above:

Kansas Gas and Electric Company did not provide a written report within 30 days concerning spalling of concrete in the reactor cavity which was initially reported as a construction deficiency (considered to be a reportable deficiency under 10 CFR 50.55(e)) to the Region IV office on March 7, 1980. An interim report was issued on May 14, 1980.

This is an infraction.