

Appendix A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on June 2-5, 1980, it appears that certain of your activities were not conducted in full compliance with the conditions of your Construction Permit No. CPPR-103 as indicated below:

A. Failure to Follow Procedures for Control of Design Modifications

Criterion V of Appendix B to 10 CFR 50 requires that activities affecting quality 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.

Criterion III of Appendix B to 10 CFR 50 states in part that, "Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design and be approved by the organization that performed the original design unless the applicant designates another responsible organization."

Tompkins-Beckwith (T-B) Procedure No. ASP-IV-37, Revision H, "Control of 'As-Built' Information for Piping and Pipe Support Systems," paragraph 1.2 states that this procedure is intended for, "making minor modifications in the field which do not affect the intent of the design." Paragraph 4.2 states, "Minor modifications are limited to those specified in paragraph 6.3." Paragraph 6.3 does not include pipe support and restraint design modifications which require a new engineering stress analysis.

Contrary to the above:

Pipe restraint No. CDRR-322 was modified, through the use of Procedure ASP-IV-37, to replace two W4x13 beams with a 4 inch square box beam manufactured from 1/2 inch steel plate. Through discussions with licensee representatives, it was determined that the modification was a modification which should have been analyzed for structural adequacy prior to installation. Since this design change was beyond the scope of Procedure ASP-IV-37, the change was not subjected to those design control measures applied to the original design.

This is an infraction.

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B. Failure to Control Use of a Calibrated Tool Within Necessary Limits

Criterion XII of Appendix B to 10 CFR 50 requires that tools, gauges, instruments, and other measuring and testing devices used in activities affecting quality be properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits.

Tompkins-Beckwith Procedure No. TBP-33, Revision B, "Procedure for Inspecting Drilled-In Expansion Type Anchors in Seismic Class I Concrete," Exhibit I, "Expansion Anchor Test and Inspection Data," requires that 1/2 inch diameter bolts be torqued to a value between 90 and 100 foot-pounds (ft-lbs).

Contrary to the above:

The 1/2 inch diameter anchor bolts on pipe restraint No. CDRR-322 were torqued using controlled tool No. 256 which was not calibrated for the range of torque values specified in Procedure TBP-33.

This is an infraction.