

Appendix A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on July 23-26, 1980, it appears that certain of your activities were not conducted in full compliance with the conditions of your Construction Permits No. CPPR-128 and 129 as indicated below:

A. Failure to Develop Appropriate Procedures to Assure Traceability of Embed Material

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."

The South Texas Project PSAR, Section 17.1.8 B states in part, "Brown & Root (B&R) assures, by procedures, that materials, items and components subject to fabrication, processing or assembly maintain their identity."

B&R QA Manual, Section 8.0 states in part, "Project procedures shall be established and implemented to provide . . . methods for insuring traceability of items to documentation . . . Brown & Root QC inspectors shall verify that proper identification of field installed items has been maintained throughout erection or installation by comparison with isometrics, flow sheets, WDC, etc."

Contrary to the above:

On July 23, 1980, during Pour No. MFA2-W008-3A, the RRI determined that Quality Construction Procedure A040 KPCCP-3, Revision 4, "Prepour Activities," which specifies the in-place inspection to be performed by the QC inspector, did not provide methods for assuring traceability of field installed items to documentation. Specifically, the procedure does not require QC inspectors to verify that proper identification of field installed items has been maintained throughout erection or installation by comparison with isometrics, flow sheets, WDC, etc. Discussions with the lead and discipline QC inspectors, confirmed that they do not verify traceability of field installed items.

A similar matter was previously identified as Unresolved Item No. 50-498/79-19-01; 50-499/79-19-01 in IE Investigation Report No. 50-498/79-19; 50-499/79-19.

This is an infraction

B. Failure to Assure that Purchased Material Conformed to Procurement Documents

10 CFR 50, Appendix B, Criterion V states, "Activities affecting quality shall be accomplished in accordance with instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Brown & Root Vendor Surveillance Plan for Bostrom-Bergen requires that the vendor inspector inspect for workmanship in accordance with paragraph 4.28.9 of AWS D1.1 which states, "after welding, arc shields shall be broken free from shear connectors and anchor studs and where practicable from all other studs."

Contrary to the above:

On July 23-26, 1980, the RRI inspected storage/issue areas "F," "M," and "P," and observed over seven hundred Bostrom-Bergen embeds, which had six to eight stud welds per embed. The ceramic arc shields had not been completely broken free on the majority of embeds inspected, although it was practicable to do so. On at least twenty embeds, the shields that were left prevented visual inspection for 360 degrees. The majority of the embeds had smaller pieces of the ceramic shields in place which prevented full visual inspection of the welds.

This is an infraction.

C. Failure to Respond to B&R Audit Findings

10 CFR 50, Appendix B, Criterion V states, "Activities affecting quality shall be accomplished in accordance with instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

B&R Procedure ST-QAP-7.1, revised February 24, 1979, paragraph 5.8.1 states in part, "If an acceptable response is not received within ten (10) working days after the committed response date, the Audit Section Manager shall prepare appropriate correspondence (internal memorandum or B&R letter) to the manager of the audited organization from the Quality Assurance Manager requesting immediate attention and response."

Contrary to the above:

Audit deficiencies resulting from Brown and Root, Inc. Audit No. ST-36 conducted March 24 and April 7-10, 1980, were discussed by the auditors with the audited organization in a post audit meeting held on April 14, 1980. Subsequent documentation of the audit findings was completed on May 13, 1980, and a committed response date of May 29, 1980, was required. An impasse between the auditors and the audited organization concerning corrective action of several of the deficiencies was evident on or before June 20, 1980. Discussion by the RRI with the B&R Audit Section Manager

on July 25, 1980, revealed that he had not prepared appropriate correspondence and sent it to the audited organization after not having received an acceptable response within ten working days after the committed response date.

This is an infraction.