

Appendix A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted during June 30-July 3, 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:

Failure to Provide Appropriate Procedures for Activities Affecting Quality

10 CFR 50, Appendix B, Criterion V requires that documented procedures shall be appropriate to the circumstances for activities affecting quality.

Regulatory Guide 1.4, Position 4 requires that pertinent quality assurance requirements of Appendix B to 10 CFR 50 should be applied to all activities affecting the safety-related functions of those portions of structures, systems, or components whose continued function is not required, but whose failure could reduce the functioning of a safety-related function.

Contrary to the above:

A review of the following Daniel procedures for installation and inspection of cable raceway and raceway supports revealed that these procedures do not appropriately address the activities associated with II/I supports and raceway:

WP-X-300, Rev. 5, "Installation of Electrical Raceway"

WP-X-302, Rev. 3, "Installation of Electrical Raceway Supports"

QCP-X-300, Rev. 4, "Installation of Electrical Raceway"

Specifically:

1. WP-X-300, paragraph 4.1.9 requires that copies of work assignments for Class IE and II/I be sent to QC. However, the work assignment sheet (Exhibit A) does not provide provisions for the identification of II/I raceway. The rework assignment (Exhibit D) does provide for II/I raceway identification.
2. With the exception of paragraph 4.1.9 and Exhibit D, WP-X-300 does not address II/I raceway with regards to documentation of records storage or retention.
3. WP-X-302, paragraph 3.23 requires QC inspection of II/I supports via a raceway installation card marked with the symbol II/I. However, WP-X-300 paragraph 4.1.18, which requires the raceway installation card for Class IE, does not address II/I.

4. WP-X-302, paragraph 3.12 requires that QC inspect Class IE and II/I supports, but the work assignment (Exhibit B) does not require the identification of II/I raceway supports. The rework assignment (Exhibit D) does provide for II/I raceway support identification.
5. QCP-X-300 does not address II/I raceway, even though there exists a requirement for QC to receive II/I raceway installation cards, and II/I work assignments for notification of final or in-process inspection requirements of WP-X-300 and WP-X-302.

The above are examples of failure to provide appropriate procedures for activities affecting quality as required by Appendix B, 10 CFR 50.

This is an infraction.