

APPENDIX A

NOTICE OF VIOLATION

Public Service Electric and Gas Company

Docket Nos. 50-354
50-355

This refers to the inspection conducted by the resident inspector assigned to the Hope Creek Generating Station, Units 1 and 2, Hancock's Bridge, New Jersey, of the activities authorized by NRC License Nos. CPFR-120 and 121.

During this inspection, conducted on October 6 - November 2, 1980, the following apparent items of noncompliance were identified:

- I. 10 CFR 50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings... and shall be accomplished in accordance with these instructions, procedures, or drawings."

Section 16.4.5 of Chapter 16 of the PSAR states, in part, that: "... quality related activities are documented and controlled by written procedures and instructions."

Paragraph 1.9.2 of Chapter 1 of the PDM QA Manual, states, in part, that: "... any modification... from the... drawing used for stress analysis, has been certified... as having been satisfactorily reconciled with those calculations."

PDM Letter No. CLB-152-2429 dated 10/3/80, which was written to clarify PDM drawing requirements, stated that the vertical component of the safety relief valve (SRV) piping supports will carry a proper amount of dead weight load.

Contrary to the above, as of October 21, 1980, Schneider, Inc., a subcontractor to PDM, was not installing the SRV piping and supports in accordance with PDM drawings and PDM Letter No. CLB-152-2429: The SRV piping was being cold sprung in a downward direction to establish a required slope, thus, resulting in the vertical component of the SRV piping support functioning in a condition opposite to that intended. Additionally, SI was rigging the 10" diameter SRV piping into position by using the 6" diameter spray header piping as the purchase point for the rigging operation. This rigging operation had not been evaluated and approved by experienced personnel and demonstrates a lack of good engineering practice.

This item is an infraction applicable to Docket Number 50-354.

- II. 10 CFR 50, Appendix B, Criterion XIII states, in part, that: "Measures shall be established to control the ... storage ... and preservation of material ... in accordance with work and inspection instructions to prevent damage or deterioration."

Section 16.4.13 of Chapter 16 of the PSAR states, in part, that: "For ... subcontractor work, special ... storage ... and preservation requirements are identified in technical specification..."

Paragraph 18.3.3 of Bechtel Design Specification C-152(Q), Rev. 14, "Design Specification for Furnishing, Designing, Detailing, Fabrication, Delivery, and Erection of Primary Containment" states, in part, that: "... all pipe ends shall be capped with metal or plywood caps to protect the surfaces and to prevent entry of foreign materials or moisture. Caps will remain in place during storage, shipment, and handling."

Contrary to the above, as of October 21, 1980, pipe ends were not capped to protect surfaces and prevent entry of foreign materials or moisture in the area of work being performed by Schneider, Inc.

This item is a recurrent infraction applicable to Docket Number 50-354.

- III. 10 CFR 50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings ... and shall be accomplished in accordance with these instructions, procedures or drawings."

Section 16.4.5. of Chapter 16 of the PSAR states, in part, that: "Bechtel quality related activities are documented and controlled by written procedures and instructions."

Paragraph 3.6.1. of Section IX, Rev. 1, of the Bechtel Construction Quality Control Manual states: "Each contractor and subcontractor is responsible for controlling the quality of work performed by his subtier contractors." Paragraph 3.3.1 of this same document goes on to explain that Bechtel has a surveillance inspection requirement to ensure contractor and subcontractor activity is in accordance with contract documents.

Contrary to the above, as of October 21, 1980, PDM and Bechtel surveillance inspection programs failed to identify and correct serious installation errors involving Schneider, Inc. installation of the SRV piping supports and failed to identify the recurrent problem of Schneider, Inc.'s failure to ensure piping internal cleanliness.

This item is an infraction applicable to Docket Number 50-354.