

Washington Public Power Supply System
P. O. Box 968
Richland, Washington 99352

Docket Nos. 50-508, 50-509
Construction Permit Nos. CPPR-154, 155

APPENDIX A

NOTICE OF VIOLATION

As a result of the inspection conducted on November 18-21, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.4.5 of the Quality Assurance Program documented in the approved PSAR deviation 18-WP, states, in part, that "Activities affecting quality...shall be accomplished in accordance with...instructions, procedures or drawings."

Specification No. 3240-4, titled "Piping and Piping Supports - WPPSS Quality Class I, II and G," in Division 2, Section 2A, paragraph 6.01a states that "All fabrication covered by this specification shall be in accordance with ASME Section III" and further states in paragraph 6.01d-iii that "The ends of the pipe-to-pipe, pipe-to-fitting, and pipe-to-valve joints shall be aligned as accurately as practical within the existing commercial codes and standards tolerance of pipe diameters, pipe wall thickness, and out-of-roundness." The ASME B&PV Code, 1974 Edition, Summer 1976 Addenda, Subsection NC, Table NC-4232(a)-1 specifies a maximum allowable offset in final welded circumferential joints of $1/4 t$ where t is the nominal thickness of the thinner section at the joint and is less than or equal to $1/2$ inch.

Contrary to the above, on November 19, 1980 at the Saginaw storage area, circumferential shop weld "A" on piping subassembly No. 3-2CH-20-150-2 had a five (5) inch long area of internal offset measuring $3/16$ inch. This offset is twice the aforementioned code allowable maximum offset of $3/32$ for this thickness pipe ($.375$ inch). This piping had been accepted by the site receiving inspection organization.

This is a Severity Level V violation (Supplement II) and is applicable to Docket No. 50-508.

- B. 10 CFR 50 Appendix B, Criterion V, as implemented by section 17.4.5 of the Quality Assurance Program documented in the approved PSAR deviation 18-WP, states, in part, that "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."

POOR ORIGINAL

Contract specification No. 3240-265, "Reactor Building Concrete Construction", the governing specification for the contractor's (J. A. Jones Construction Company) work activities on the reactor building, states in paragraph 14.6.4 that for nonconformance reports, "Contractor shall submit the original completed nonconformance report with applicable supporting engineering and inspection documentation to Engineer's Quality Assurance Site Supervisor." Paragraph 14.6.6 states that, "For NRB reviewed nonconformances, Engineer shall also witness the re-inspection, determine its acceptability and sign off the nonconformance report after prior contractor inspection and approval."

Contrary to the above:

The following documented procedures, implementing contract specification no. 3240-265, did not include appropriate requirements of the specification in that:

1. J. A. Jones procedure no. POP-N-703, titled Nonconformance Reporting, does not include the requirement of the contract specification that, for contractor dispositioned nonconformance reports, the contractor shall submit the original completed nonconformance report with applicable supporting engineering and inspection documentation to the Engineer's Quality Assurance Site Supervisor.

Nonconformance report nos. 2907 and 2910, dated May 5 and 9, 1980, were dispositioned by J. A. Jones but the supporting concrete inspection reports and final placement records were not submitted to the Engineer's Quality Assurance Site Supervisor.

2. J. A. Jones procedure no. POP-N-703 and WPPSS/Ebasco Administrative Site Procedure No. ASP-QA-7-3, prescribing the controls for owner/engineer evaluation and disposition of nonconformance reports, do not include the requirement that the Engineer shall witness and determine the acceptability of the reinspection and sign off the nonconformance report for nonconformances reviewed by the Nonconformance Review Board (NRB).

J. A. Jones nonconformance reports nos. 2910 and 2930, dated May 9 and September 16, 1980, were reviewed by the NRB but these reports were not signed off by the Engineer attesting the witnessing and acceptability of the reinspection.

This is a Severity Level V violation (Supplement II) and is applicable to Docket Nos. 50-508 and 50-509.

Pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

11/2/97

Dated

G. S. Spencer

G. S. Spencer, Chief
Reactor Construction and Engineering
Support Branch

POOR ORIGINAL