

Appendix A

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-329

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As a result of the inspection conducted on January 7-9, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

1. 10 CFR 50, Appendix B, Criterion V, requires in part "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings".

CP QA Program Policy No. 5 states in part, "Prior to performing...inspection on a safety related item, suppliers are required to develop written procedures for . . . performing required inspection and tests. These procedures reference applicable drawings, specifications, codes and standards. CPCo QA Departments review field... inspection procedures prior to implementation".

Contrary to the above, the inspector determined that U. S. Testing Company has not established test procedures for soils work activities. The specification for testing, C-208, references ASTM standards for performing specific tests, but does not include procedural controls or instructions for implementing the tests.

This is Severity Level V violation.

2. 10 CFR 50, Appendix B, Criterion VI requires in part, "Measures shall be established to control the issuance of documents . . ."

CP QA Program Policy No. 6 states in part, "Documents which prescribe activities affecting quality . . . are . . . controlled according to written procedures. . . . The document control system provides for: Identifying the proper documents to be used in performing a quality related. . . activity; establishing current and updated distribution lists".

Contrary to the above, the inspector determined that U. S. Testing Company test result forms are not controlled. The proper documents to be used for a specific test are not defined. There is no distribution list for the forms. The latest revision of the forms are not controlled.

This is a Severity Level V violation.

3. 10 CFR 50, Appendix B, Criterion XVII, requires in part, "Sufficient records shall be maintained to furnish evidence of activities affecting quality".

ANSI N45.2.9, Section 3.2.1. requires in part, "Quality assurance records shall be considered valid only if stamped initialed, signed, or otherwise authenticated and dated by authorized personnel".

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CP QA Program Policy No. 17 states in part, "Compile records as specified in applicable procedures, codes . . ."

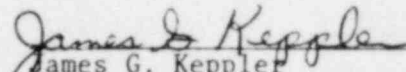
Bechtel Field Instruction FIC-1.100, Appendix A under Daily FER, paragraph No. 18 states in part, "Review and initial all acceptable test report sheets from U.S. Testing . . ."

Contrary to the above, the inspector observed that numerous U.S. Testing report sheets were rubber stamped with the name of the onsite geotech engineer and not initialed and dated as required. In addition, there were no procedural controls for the use of the signature stamp.

This is a Severtiy Level VI violation.

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within twenty-five days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further 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.

Dated February 3, 1981


James G. Keppler
Director