APPENDIX A

NOTICE OF VIOLATION

Georgia Power Company
Hatch 1 and 2

License Nos. DPR-57
NPF-5

Based on the NRC inspection July 7-11, 14-18, and 22-24, 1980, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below. These items have been categorized as described in correspondence to you dated December 31, 1974.

A. As required by 10 CFR 50, Appendix B, Criteria I and XVI, the persons and organizations performing quality assurance functions shall have sufficient authority and organizational freedom to identify quality problems and to verify implementation of solutions. It is further required that measures shall be established to assure that conditions adverse to quality are promptly corrected. The accepted QA Program (FSAR) Section 17.2.1.1.3 states that the Manager of Quality Assurance, by reporting to the Executive Vice President, has the authority and independence necessary to effectively assure conformance to quality requirements. Section 17.2.18 states that the Quality Assurance Department will use audit finding reports (AFR's) to assure that responsible management has implemented corrective action.

Contrary to the above, the Quality Assurance Department does not effectively assure conformance to quality standards in that it does not assure prompt correction of conditions adverse to quality. Specifically, between October 27, 1978 and April 11, 1980, the Nuclear Regulatory Commission has issued five citations for failure to take corrective actions by the mechanisms defined for corrective action within the QA Program (Reports 50-366/78-44; 50-321/79-07, 50-366/79-08; 50-366/79-09; 50-321/79-11; 50-366/79-15; and 50-321; 50-366/80-17). Further, of 119 QA Program AFR's written in 1978 and 135 written in 1979, 9 items from 1978 and 35 items from 1979 remain uncorrected as of July 11, 1980. In addition, of 45 AFR's written in 1980 which required completion of corrective action on or before March 13, 1980, 12 remain uncorrected as of July 11, 1980 (i.e., overdue by 120 days or more).

This is an infraction. A similar item was brought to your attention in our letters to you dated December 8, 1978; April 2, 1979; March 23, 1979; May 18, 1979 and May 19, 1980.

B. As required by 10 CFR 50, Appendix B, Criterion X, a program for inspection of activities shall be established and shall be executed by individuals other than those who performed the activity being inspected.

1. The accepted QA Program (FSAR) Section 17.2.10 states that the QA Manual, Section 10, requires inspection by personnel other than those performing the activity. The QA Manual, Section 10, paragraph 10.2.a states that: "Measures shall be established to assure that inspection personnel are independent from the individual or group performing the activity being inspected."

Contrary to the above, a program for inspection of activities affecting quality was not executed by individuals other than those performing the work activity being inspected as defined in the licensee's accepted QA Program in that:

a. The inspection of firestops associated with 2 Maintenance Requests (MR's) on Unit 1 (1-79-285, 1-79-741) and with 3 MR's on Unit 2 (2-79-4076, 2-78-4658, 2-78-4714) were conducted by the foreman of the men who performed the activities.

b. The inspection following the repair of Hydraulic Control Unit 18-35 (MR 1-79-25) on Unit 1 on July 2, 1979, was conducted by the foreman directing the repair activity.

These examples were taken from selected work activities for the period January through October 1979.

2. The accepted QA Program (FSAR) Section 17.2.2.2, Item 2, requires implementing procedures to be written, reviewed and approved by each responsible organization. Item 1 of the same section states that the QA Manual contains the requirements that must be met. Section 2.4 of the QA Manual states that detail procedures shall be prepared, approved and controlled by the organization responsible for their implementation. Section 10.3 of the QA Manual states that the GPC Power Generation Department shall be responsible for the surveillance inspection of work performed by plant personnel and contractors at the plant site.

Contrary to the above, the licensee has not established an inspection program in that portions of the QA Program which allow personnel within a department to perform surveillance inspection of work within that department (the alternate inspection program) have not been documented by written procedures in that:

a. There was no documented method for designating alternate inspectors or for specifying when and how alternate inspectors were to be utilized.

b. There were no criteria for establishing the "independence" of these inspectors as required by Section 10.2 of the QA Manual.

These examples are based on six Maintenance Requests (1-79-285, 1-79-741, 2-79-4076, 2-78-4658, 2-78-4714 and 1-78-2529) in which alternate inspection activities are not carried out in accordance with the accepted QA Program.

3. The accepted QA Program (FSAR) Section 17.2.10 requires that inspectors be certified in accordance with applicable standards. Section 17.2 states that applicable standards for the Program are listed in Appendix A of the FSAR. Appendix A of the FSAR states that the Program complies with ANSI N45.2.6-1973. ANSI N45.2.6-1973, Section 2.2, requires that each person who verifies conformance of work activities to quality requirements shall

be certified as being qualified to perform his assigned work. An assigned quality requirement, according to the accepted QA Program's commitment to ANSI N45.2.2, Section 5.2.1 is the Shipping Damage Inspection.

Contrary to the above, the licensee has not established an inspection program in accordance with the accepted QA Program in that there are no provisions to certify persons performing Shipping Damage Inspections. Based on interviews and observations, the inspector verified that those persons assigned this inspection activity were qualified to perform the function.

This is an infraction.

C. As required by 10 CFR 40, Appendix B, Criterion XVIII, followup action, including reaudit of deficient areas, shall be taken where indicated. The accepted QA Program (FSAR) Section 17.2.18, states that the audit program will be regularly reviewed by the Manager of QA to assure implementation of the requirements in the QA Manual. Section 17.2.2.2 of the accepted QA Program also states that the QA Manual contains the requirements that must be met. Section 18.2.d of the QA Manual requires that measures be established to assure that deficient areas are promptly reaudited until corrections have been accomplished.

Contrary to the above, reaudits of deficient areas were not conducted where indicated in that items identified during three specific audits had not been reaudited nor was the current status of correction known by the auditing organization as of July 24, 1980. Specifically: (1) the audit of Power Supply Engineering and Services conducted September 5-7, 1978 identified seven deficient areas which had not been reaudited nor was their status known; (2) the audit of Environmental Programs conducted October 17-18, 1979 identified two deficient areas, one of which was closed on February 5, 1980, but the other had not been reaudited nor was its status known; and, (3) the audit of "Q" Motor Repair Program conducted January 24, 1980, identified two deficient areas which had not been reaudited, which had no specified completion date, and the status of corrections was not known.

This is an infraction.

D. As required by 10 CFR 50, Appendix B, Criterion V, activities affecting quality shall be accomplished in accordance with documented procedures. The accepted QA Program (FSAR) Section 17.2.5 also states that activities affecting quality shall be accomplished in accordance with documented procedures. Procedure QA-05-06, "Preoperational, Startup and Operational Audits", Revision 6, dated February 1980, requires in paragraph D.3 that the audited organization provide a response to an Audit Finding Report (AFR) within 30 days of receipt.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedure QA-05-06 in that:

1. For 7 AFR's written in the last quarter of 1979 for which required responses were not received within the 30 day period and the average period overdue was 50.28 days.

2. For 5 AFR's written in the first half of 1980 for which required responses were not received within the 30 day period, 4 had not been received as of July 11, 1980, and the average period overdue as of that date was 87.5 days.

This is an infraction.

E. As required by 10 CFR 50, Appendix B, Criterion VI, measures shall be established to control the issuance of documents, including changes thereto, which describe all activities affecting quality. The accepted QA Program (FSAR) Section 17.2.6.1 states that an Administrative Assistant shall establish a system ensuring that the responsible supervisors receive current revisions of required documents.

Contrary to the above, as of July 16, 1980, measures had not been established for the control of vendor technical manuals, and changes thereto, referenced in safety-related plant procedures and necessary for carrying out the activities presecribed herein. Specific examples include but are not limited to the following examples:

1. Current revisions were not entered into the Control Room, Test Shop and Maintenance Shop copies of manual GFK 9690, Volume X, Part 3.

2. Current revisions were not entered into the Maintenance Shop copy of the High Pressure Coolant Injection Pump, Instrument and Operations Instruction Manual.

3. Current revisions were not entered into two of four Master File copies of the Main Steam Relief Valve Technical Manual.

This is an infraction.

F. As required by Technical Specification 6.8.1, procedures shall be implemented.

1. HNP-821, "Quality Control Work Inspection", Revision 5 dated 9/78, paragraph 8.6 requires alternate inspectors to be designated by the Site Quality Control Supervisor (SQCS) and, upon completion of the inspection, that the results be documented on the forms referenced in the procedure.

Contrary to the above, procedure HNP-821 was not implemented in that the alternate inspectors verifying activities associated with the replacement and repair of 270 valves on the Hydraulic Control Units of Unit 1 in July of 1979 were not designated by the SQCS nor were the inspection results documented on the specified forms.

2. HNP-8, "Maintenance Request (MR)", Revision 13 dated 3/80, paragraph 12.c requires that when consumables or off-the-shelf items are used and are not obtained with an Inventory Material Request (IMR), the worker shall provide a description of the item(s) used on the back of the MR form.

   Contrary to the above, procedure HNP-8 was not implemented in that for 4 of 25 MR's reviewed (1-80-3398, 1-80-3619, 1-80-3414, and 1-80-3511) items were replaced and no IMR was used and the parts were not identified on the MR.

This is an infraction applicable only to Unit 1 based on the specific examples identified.

G. As required by 10 CFR 50, Appendix B, Criterion V, activities affecting quality shall be prescribed by documented procedures which shall contain appropriate quantitative and qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. The accepted QA Program (FSAR) Section 17.2.5 also requires activities affecting quality to be prescribed by documented procedures that contain appropriate qualitative or quantitative acceptance criteria for determining that important activites have been satisfactorily accomplished.

Contrary to the above, the procedure covering the QC inspection activity (HNP-821, "Quality Control Work Inspection", Revision 5 dated 9/78) does not contain either qualitative or quantitative acceptance criteria for determining when the inspection activity must be accomplished. The procedure states that a Quality Control specialist reviews Maintenance Requests (MR's) and then determines if an inspection is required. The decision is to be made "if the work involved is significant enough to warrant QC inspection". The inspector found no QC inspection performed on any MR's associated with Instrumentation and Control work (one case of improper alternate inspection was conducted) and no involvement in non-MR areas such as operations and health physics.

This is an infraction.

H. As required by 10 CFR 50, Appendix B, Criterion II, the status and adequacy of the QA Program shall be regularly reviewed. The accepted QA Program (FSAR) Section 17.2 states that the QA Program implements ANSI N18.7-1976. ANSI N18.7-1976, paragraph 5.2.15 requires that procedures shall be reviewed no less frequently than every two years to determine if changes are necessary or desirable.

Contrary to the above, the status and adequacy of the QA Program was not regularly reviewed in that of the 45 procedures in the QA Department Procedure Manual, 23 had not been reviewed for periods in excess of 2 years. Two procedures were last reviewed in 1975, seven procedures were last reviewed in 1976, three procedures were last reviewed in 1977, and eleven procedures were last reviewed in the first half of 1978. Since review of

procedures is not documented, the latest revision date was used to determine the date of last review. (A revision is considered a review under paragraph 5.2.15 of ANSI N18.7-1976.)

This is a deficiency.

I. As required by Technical Specification 6.8.3, each procedure required by Technical Specification 6.8.1 shall be reviewed periodically as set forth in administrative procedures. Procedure HNP-814, "Procedure Reviews", Revision 6 dated April 1980. Section B, states that: "Biennial reviews shall be conducted within the month specified by the Records Department."

Contrary to the above, procedures required by Technical Specification 6.8.1 are not periodically reviewed as set forth in HNP-814 in that of the 700 procedures specified by the Records Department to be reviewed in the months of February, March, April, May and June of 1980, 540 were not reviewed in the month specified and 473 remained unreviewed as of July 10, 1980.

This is a deficiency.

J. As required by 10 CFR 50, Appendix B, Criterion IV, measures shall be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment, and services. The accepted QA Program (FSAR) Section 17.2 states that Program is established, in part, by compliance with ANSI N45.2.13-1976. This standard defines "procurement document" to include purchase requisitions. Section 3.1 requires that changes to procurement documents shall be subject to the same degree of control as utilized in the preparation of the original document.

Contrary to the above, the licensee has not established measures to assure that requirements are included in procurement documents in that there are no provisions for controlling changes made to purchase requisitions. The inspector determined by interview with responsible managers, that changes to purchase requisitions are made after these documents have been transmitted to the Company offices from the plant site and without the same degree of control utilized in preparation of the original documents.

This is a deficiency.

K. As required by 10 CFR 50, Appendix B, Criterion XVII,, records shall be maintained to furnish evidence of activities affecting quality and requirements concerning record location. The records shall include the results of inspections. The accepted QA Program (FSAR) Section 17.2.17 requires that records be prepared to document activities affecting quality and lists inspection results as a typical record. The Section further requires that written procedures control the storage of records.

Contrary to the above, records of inspections were not maintained and requirements concerning record location were not established in that:

1. Shipping damage inspections are not documented.

2. Unit 1 and 2 records are stored in the Georgia Power Company Block House on site and this structure is not described as a record storage location in the licensee's procedure HNP-820, "Plant Records Management", Revision 10 dated 8/79.

This is a deficiency.

L. As required by 10 CFR 50, Appendix B, Criterion XIII, measures shall be established to control the storage of material and equipment to prevent damage. The accepted QA Program (FSAR) Section 17.2 states that the Program will follow Standards listed in Appendix A. Appendix A states that the licensee's Program will meet the requirements of ANSI N45.2.2-1972. ANSI N45.2.2-1972, Sections 3.5.1 and 6.4.2 require that threads and weld end preparations shall be protected with caps or plugs.

Contrary to the above, measures were not established to control the storage of materials and equipment to prevent damage to weld end preparations in that:

1. The licensee had no program to install caps or plugs as required by the Program's commitment to ANSI N45.2.2; and,

2. The inspector found numerous stainless steel elbows, with weld end preparations, purchased under order PEH2-6442 that were stored without the required caps or plugs.

None of the stored elbows had any observable damage to the weld end preparations.

This is a deficiency.