

APPENDIX A

Notice of Violation

Gulf States Utilities Company

Docket: 50-458
CPR-145

As a result of the inspection conducted during April and May 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

Inadequate Acceptance Criteria For In-Place Density Testing of Backfill

Criterion XI of Appendix B to 10 CFR Part 50 requires that a test program be established with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Stone and Webster Specification 210.100, Revision 2, "Site Development Work" requires that a curve correlating relative density to in-place density be established. The specification states, "The acceptance criteria will be a minimum acceptable in-place unit weight derived for compaction control from the maximum/minimum density test (as determined in accordance with ASTM D2049-69). A high percentage of the fill is to be placed in excess of seventy percent relative density, although sixty percent relative density may be accepted on a case-by-case basis."

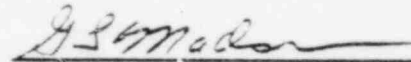
Contrary to the above, from the review of the in-place density test reports, the NRC inspector determined that the unit weight value listed as the minimum acceptable density corresponds to sixty percent relative density. This represents blanket approval of the sixty percent relative density value as being the minimum acceptable, and is contrary to the specification requirement of reviewing corresponding in-place density tests on a case-by-case basis. In addition, the statement that a "high percentage" of the fill is to be placed in excess of seventy percent relative density, represents a qualitative rather than quantitative value and as such does not satisfy the requirement that test procedures incorporate acceptance limits.

This is a Severity Level V violation.

Pursuant to the provisions of 10 CFR 2.201, Gulf States Utilities is hereby required to submit to this office within 30 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. Consideration may be given to extending your response time for good cause shown.

Date 6/5/81



G. L. Madsen, Chief
Reactor Projects Branch