APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company Philadelphia, Pennsylvania 19101 License No. CPPR-106

Docket No. 50-352

As a result of the inspection conducted on May 1-29, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

10 CFR 50, Appendix B, Criterion XV, states in part: "Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

The Limerick PSAR, Appendix D.4.10, states in part: "The vendor shall have written procedures governing the identification, control, and disposition of materials, parts, or equipment that do not meet specification requirements."

The Bechtel Nuclear Quality Assurance Manual, Section IV, Number 7, paragraph 3.1, states in part: "Construction quality control procedures for processing nonconforming items shall provide for:...

g. Obtaining approval signatures of authorized personnel for conditional release of nonconforming materials."

The Project Special Provision G-3.1, paragraph 3.3, states in part: "Non-conforming items documented on a Nonconformance Report may be released for installation or further work subject to the following conditions:

- (1) The installation and further work is approved by the Project Field Engineer with the concurrence of the Project Field Quality Control Engineer. Concurrence of the Lead Site Quality Assurance Engineer and/or the Project Quality Assurance Engineer is required for "Q" listed and ASME Section III code items; and the Authorized Inspector for all ASME Section III code items. Approval and concurrence is documented by signature and date on the conditional release form...
- (3) The conditional release shall be attached to the nonconformance report and applicable restrictions, if any, on use or further work to the nonconforming item, shall be noted on the conditional release.

Contrary to the above, Nonconformance Report No. 3979 was issued against pipe support GBB-112-H10 on January 28, 1980, and Field Change Request M-7240F, providing for plug welds of the anchor bolt studs to the base plate, was approved on March 3, 1981, and implemented thereafter without the issuance of a conditional release.

This is a Severity Level V Violation (Supplement II), applicable to CPPR-106.

Pursuant to the provisions of 2.201, Philadelphia Electric Company 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 violations; 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	JUN 26 1981	1 Lumis
		R. R. Keimid, Chief Projects Branch #2 Division of Resident and Project Inspection