

Appendix A

NOTICE OF VIOLATION

Washington Public Power Supply System  
P. O. Box 1223  
Elma, Washington 98541

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

As a result of the inspection conducted on April 13-23, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), five apparent items of noncompliance were identified. The inspection revealed that certain activities performed by your contractors did not conform to the criteria of 10 CFR 50, Appendix B, as described in Section 17 of your PSAR (as modified by PSAR Deviations Nos. WP25 and 26). Specifically, the items identified below had not been identified or corrected.

- A. 10 CFR 50, Appendix B, Criterion VI, states, in part: "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes...are distributed to and used at the location where the prescribed activity is performed...."

Paragraph 17.2.6 of the Quality Assurance Program states, in part: "...Approved changes are promptly included where applicable into instructions, procedures, drawings, and other appropriate documents... Obsolete or superseded documents are controlled to prevent inadvertent use...."

Contrary to the above, as of April 16, 1981, the Ebasco Site Support Engineering (ESSE) Group had not established measures to assure that approved changes to documents are distributed and used. Seven drawings were identified in ESSE controlled file No. R-15 which did not include approved changes that applied to these drawings (WPPSS/Ebasco drawings 3240-G-2520-S1; 2520-S2; 2521; 2539; 2550; 1300-4; and 1325).

This is a Severity Level IV Violation (Supplement II), applicable to Units 3 and 5.

- B. 10 CFR 50, Appendix B, Criterion V, states: "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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

8108040375 810720  
PDR ADDCK 05000508  
G PDR

Paragraph 17.1.5 of the Quality Assurance Program states, in part: "...Contractors and vendors, including Ebasco and CE, are required to have written instructions, procedures, policies, and/or drawings which govern their quality related activities...."

1. Specification No. 3240-412, (Formed Concrete Construction), paragraph 5.02, specifying quality related requirements for placing and field bending reinforcing steel, states, in part: "...Rebar shall be cold bent using proper bar bending equipment and the diameter of the bend measured on the inside of the bar shall not be less than the following...:

| <u>Bar Size</u> | <u>Minimum Diameters</u> |
|-----------------|--------------------------|
| Nos. 3 thru 8   | 6 bar diameters          |
| Nos. 9, 10, 11  | 8 bar diameters..."      |

Contrary to these governing instructions, on April 22, 1981, the reinforcing bar bending equipment, utilized by Morrison-Knudsen for field bending of safety related reinforcing steel, had bending pin sizes which resulted in a bend inside diameter smaller than those required by the specification, for bar sizes 4, 5, 6, 8, 10 and 11: by about 1.3 bar diameters for No. 4 bar; 2.24 bar diameters for No. 5 bar; 1.9 bar diameter for No. 6 bar; 1.25 bar diameters for No. 8 bar; 3 bar diameters for No. 10 bar; and 3 bar diameters for No. 11 bar.

This is a Severity Level V Violation (Supplement II), applicable to Units 3 and 5.

2. Morrison-Knudsen Administrative Instruction Procedure Number 15, "Stud Welding Inspection Procedure," includes quality test instructions which state in paragraph 6.3 that, "Each operator shall bend the first two studs on each day's production to 30° and the first two studs on each member to 30°."

Contrary to the above, on April 15, 1981, on the south side of Unit 3 elevation 417', the inspector observed that a stud welding operator welding on a member (Number D133B) had welded twenty-four studs without bending the first two studs.

This repeat violation is a Severity Level V Violation (Supplement II), applicable to Unit 3.

3. Ebasco drawing No. 3240-G-3357 which governs structural steel beam fabrication shows that stiffener plates are coped or clipped at the beam web and flange intersections and that

fillet welds terminate at the coped edge of the stiffener plate.

Contrary to the above, on April 20, 1981, most of the stiffener plate welds on structural beams Nos. D119D, D35A, D63A, D64B, F18B, F69F, F11B, A25B, 318A, 308B, at a site storage area, did not terminate at the coped edge of the stiffener plates, but continued through the coped areas. These beams had been previously inspected at the fabrication shops and accepted.

This is a Severity Level V Violation (Supplement II), applicable to Units 3 and 5.

4. Administrative Site Procedure ASP-CM-4-17 Revision 0 (entitled "Care and Issue of Measuring and Testing Equipment"), in effect from March 20, 1980, to March 3, 1981, and Project Site Procedure PSP-MM-11-9, Revision 0 (Interim) (entitled "Care and Issue of Measuring and Test Equipment"), in effect since March 3, 1981, provide detail instructions on the care, handling, and issuance of calibrated equipment used to perform quality checks. Both of these procedures state, in part, "...At no time is measuring and test equipment to be issued when any damage is suspected...."

Contrary to the above, calibrated torque wrench (Serial No. 33741) was returned to the calibration storage area on December 22, 1980, with a written statement indicating it was damaged, requiring repair. On March 6, 1981, the wrench had not been repaired but was issued for use and was used to check the torque of bolts on a reactor coolant pump motor support. As of April 16, 1981, the wrench torque gauge still had a broken glass and bent indicating needle.

This is a Severity Level VI Violation (Supplement II), applicable to Unit 3.

Pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System is hereby required to submit to this office within thirty (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.

Appendix A

-4-

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

dated JUL 20 1981

Original signed by  
T. W. Bishop for  
D. F. Kirsch, Team Leader

Appendix B

SIGNIFICANT OBSERVATIONS

Washington Public Power Supply System  
P. O. Box 1223  
Elma, Washington 98541

Docket Nos. 50-508, 50-509  
License Nos. CPPR-154,  
CPPR-155

As a result of the inspection conducted on April 13-23, 1981, the following significant observations were identified in the implementation of your design and construction program. Further information on these items is included in detail paragraphs 11a-d of IE Inspection Report No. 50-508/509/80-08.

A. Procedures

Site contractor's quality implementing procedures require improvement. Actions to assure complete and workable contractor's procedures have not been fully effective.

This observation is reinforced by the following:

1. The Morrison-Knudsen procedure for field fabrication of reinforcing steel does not implement the technical requirements for minimum bend diameter.
2. A recently approved revision to the Morrison-Knudsen contract allows Ebasco Construction Management to provide the contractor technical direction in quality affecting activities without appropriate controls to assure compliance with the quality program.
3. Implementing procedures used by J. A. Jones do not consistently include or invoke specification requirements.
4. The J. A. Jones structural welding procedure is not in accordance with normal weld procedure practice and depends heavily on the welder's and inspector's knowledge of the welding code.
5. The J. A. Jones procedure for verification of concrete curing has not been amended to reflect construction/inspection practices.
6. Other examples of weak procedures are discussed in paragraph 11.a.

B. Receiving Inspection

The system utilized by the Licensee and Ebasco for on-site receipt inspection of safety-related items and components does not include conformance to engineering specifications.

C. Organization and Quality Assurance Program

Significant changes have been made in the Licensee's corporate and site organizational structures. These changes were not reflected in the PSAR and implementing corporate quality assurance program manuals in a timely manner. While interim documents have now been issued, the time allotted to finalize all the documents appears excessive.

D. Records

There is a large backlog of quality records which have been submitted by contractors for review by the construction manager (Ebasco). ✓